

# EXHIBIT J

**Atkinson-Baker, Inc.**

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2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 EASTERN PROFIT CORPORATION LIMITED,

6 Plaintiff/COUNTER-CLAIM DEFENDANT,

7 CASE NO.: 18-cv-2185 (JGK)

8 -against-

9

10 STRATEGIC VISION US, LLC

11 Defendant/COUNTERCLAIM PLAINTIFF.

12 -----X

13 30 (b) (6) DEPOSITION OF

14 GOLDEN SPRING BY AND THROUGH AMELIA COLUCCIO

15 NEW YORK, NEW YORK

16 November 12, 2019

17

18 ATKINSON-BAKER, INC.

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<p>2 IN THE UNITED STATES DISTRICT COURT    3 FOR THE SOUTHERN DISTRICT OF NEW YORK    4 -----X    5 EASTERN PROFIT CORPORATION LIMITED,    6 Plaintiff/COUNTER-CLAIM DEFENDANT,    7 CASE NO.: 18-cv-2185(JGK)    8 -against-    9    10 STRATEGIC VISION US, LLC    11 Defendant/COUNTERCLAIM PLAINTIFF.    12 -----X    13    14 Deposition of AMELIA COLLUCIO, taken on behalf of    15 defendant/counterclaimant, at 620 Eighth Avenue,    16 27th Floor, New York, New York, commencing at 9:18    17 a.m., Tuesday, November 12, 2019, before Kiara    18 Miller.    19    20    21    22    23    24    25</p>	<p>2 FEDERAL STIPULATION    3    4 IT IS HEREBY STIPULATED AND AGREED by    5 and between the counsel for the respective    6 parties hereto, that the filing, sealing, and    7 certification of the within deposition shall be    8 and the same are hereby waived;    9    10 IT IS FURTHER STIPULATED AND AGREED    11 that all objections, except as to the form of    12 the question shall be reserved to the time of    13 trial.    14 IT IS FURTHER STIPULATED AND AGREED    15 that the within deposition may be signed before    16 any notary public with the same force and    17 effect as if signed and sworn to before this    18 court.    19    20    21    22    23    24    25</p>
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<p>2    3    4    5    6    7    8    9    10    11    12    13    14    15    16    17    18    19    20    21    22    23    24    25</p>	<p>2    3    4    5    6    7    8    9    10    11    12    13    14    15    16    17    18    19    20    21    22    23    24    25</p>

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2 (Pages 2 to 5)

**30(b)(6): Amelia Coluccio**  
**November 12, 2019**

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1 A. COLUCCIO  
 2 introduce themselves. After counsel  
 3 has introduced themselves, the  
 4 witness may be sworn in by the court  
 5 reporter?

6 MR. GREIM: This morning you  
 7 have Eddy Greim and Jennifer  
 8 Denalli. We are Counsel for Graves  
 9 Garret for Strategic Vision, which  
 10 is the defendant and counterclaim  
 11 plaintiff in this case.

12 MS. TESKE: And Erin Teske  
 13 with Hodgson Russ for Golden Spring  
 14 New York, the deponent.

15 MR. GREIM: And with us here  
 16 is Daniel Podhaskie, the corporate  
 17 rep for GSNY.

18 A M E L I A C O L L U C C I O, after having first  
 19 been duly sworn by a Notary Public of the State of  
 20 New York, was examined and testified as follows:

21 COURT REPORTER: Please state  
 22 your name for the record.

23 THE WITNESS: Amelia Coluccio.

24 COURT REPORTER: Please state

1 A. COLUCCIO

2 **Q And if you could, please turn to**  
 3 **page three, which says Exhibit A at the top**  
 4 **of it. You're there.**

5 **Are these the topics on which**  
 6 **you're prepared to testify today?**

7 MS. TESKE: Object to the  
 8 form. You can answer.

9 A Yes.

10 **Q And if you turn to the next page,**  
 11 **you'll see documents be produced pursuant to**  
 12 **rule 45. There's two items on that page.**

13 A I'm sorry, what's the question?

14 **Q Do you see two items on that page?**

15 A Yes.

16 **Q Did you bring any documents with**  
 17 **you today?**

18 A No.

19 **Q Have you seen this page four of**  
 20 **the subpoena before?**

21 A No. I don't think so.

22 **Q What is your position -- let me**  
 23 **ask you this, are you an employee of Golden**  
 24 **Spring?**

25 A Yes.

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Page 8

1 A. COLUCCIO  
 2 your address for the record.

3 THE WITNESS: 162 East 64th  
 4 Street, New York 10065.

5 (Whereupon, Notice of Deposition  
 6 was marked as Golden Spring  
 7 Exhibit 1 for identification as  
 8 of this date.)

9 BY MR. GREIM:

10 **Q Ms. Coluccio, good morning?**

11 A Good morning.

12 **Q I put in front of you what we've**  
 13 **marked as Golden Spring Exhibit One. Have**  
 14 **you had a chance to review that?**

15 A No.

16 **Q Please take a look at it. And my**  
 17 **question to you is simply, have you seen**  
 18 **this document before?**

19 A I think I have.

20 **Q Do you recognize this as the**  
 21 **notice of deposition duces tecum under which**  
 22 **you're here today?**

23 MS. TESKE: Object. You can  
 24 answer.

25 A Yes.

1 A. COLUCCIO

2 **Q What is your position?**

3 A Paralegal?

4 **Q How long have you had that role?**

5 A About seven months.

6 **Q What are your duties?**

7 A Mainly to help organize legal  
 8 files and to coordinate with outside law  
 9 firms.

10 **Q Does that include this case?**

11 A Yes.

12 **Q What other cases do you work on?**

13 MS. TESKE: Object. Don't  
 14 answer that.

15 MR. GREIM: Is that an  
 16 instruction not to answer?

17 MS. TESKE: Yes.

18 **Q How many other cases do you work**  
 19 **on as paralegal at Golden Spring?**

20 A To estimate maybe 20 to 30.

21 **Q Are those all cases in which**  
 22 **Golden Spring is a party?**

23 MS. TESKE: Object. Don't  
 24 answer that.

25 **Q You work full-time?**

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Page 9

3 (Pages 6 to 9)

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1 A. COLUCCIO  
 2 A Yes.  
 3 **Q Who do you report to?**  
 4 A I report to Dan Podhaskie and  
 5 Yvette Wang.  
 6 **Q What is Dan Podhaskie's position**  
 7 **at Golden Spring New York?**  
 8 A Director of legal and compliance.  
 9 **Q What is Yvette Wang's position?**  
 10 A President.  
 11 **Q Who do you work with on a**  
 12 **day-to-day basis other than those two**  
 13 **individuals?**  
 14 A Pretty much just by myself.  
 15 **Q The address you gave us at the**  
 16 **start, 162 East 64 Street, is that where you**  
 17 **go to work every day?**  
 18 A Correct.  
 19 **Q Is that the Golden Spring office?**  
 20 A Correct.  
 21 **Q How long has that been the Golden**  
 22 **Spring office?**  
 23 A I believe we moved to that office  
 24 in May of this year.  
 25 **Q What was the office before that?**

Page 10

1 A. COLUCCIO  
 2 A Rutgers University.  
 3 **Q When did you graduate?**  
 4 A May of 2016.  
 5 **Q So did you take a year studying to**  
 6 **get your paralegal certificate?**  
 7 A No. I worked in a different field  
 8 for a year.  
 9 **Q What did you do?**  
 10 A I worked at a nonprofit and youth  
 11 services.  
 12 **Q What made you decide to be a**  
 13 **paralegal?**  
 14 MS. TESKE: Object, but go  
 15 ahead.  
 16 A I started a temporary  
 17 administrative job at a law firm and they  
 18 offered me the opportunity to work as a  
 19 paralegal, and I was interested.  
 20 **Q Do you have a paralegal**  
 21 **certificate?**  
 22 A No.  
 23 **Q How did you come to be hired at**  
 24 **Golden Spring?**  
 25 A A recruiter reached out to me.

Page 12

1 A. COLUCCIO  
 2 A It was 800 Fifth Avenue, New York,  
 3 New York.  
 4 **Q 800 Fifth Avenue, suite 21F.**  
 5 A I think so, yeah. I was only  
 6 there for a week.  
 7 **Q All right. So I want to get a**  
 8 **sense of your knowledge base, so I'm going**  
 9 **to ask you some questions a little bit about**  
 10 **Golden Spring and about your preparation.**  
 11 **Then we're just going to march through the**  
 12 **topics. Okay?**  
 13 A Um-hmm.  
 14 **Q By the way, have you given a**  
 15 **deposition before?**  
 16 A No.  
 17 **Q Have you attended a deposition**  
 18 **before?**  
 19 A Yes.  
 20 **Q How long have you been a**  
 21 **paralegal?**  
 22 A Since May of 2016 I believe -- I'm  
 23 sorry, May of 2017.  
 24 **Q Very just briefly, where'd you go**  
 25 **to college?**

Page 11

1 A. COLUCCIO  
 2 **Q Who was that?**  
 3 A Ryan Cohen.  
 4 **Q So let me ask you this, how many**  
 5 **Golden Spring employees work 162 East 64th**  
 6 **Street?**  
 7 A I believe about eight.  
 8 **Q That includes you, Mr. Podhaskie**  
 9 **and Ms. Wang?**  
 10 A I didn't include Ms. Wang in that  
 11 because she's president, not an employee.  
 12 **Q How many total Golden Spring**  
 13 **officers or employees are there?**  
 14 A Okay. Maybe nine.  
 15 **Q Could you name for me the others**  
 16 **that are there? We know three of them.**  
 17 MS. TESKE: Objection. You  
 18 don't need to answer that.  
 19 MR. GREIM: I want to know how  
 20 this person got chosen. I want to  
 21 understand who the other people are.  
 22 MS. TESKE: It doesn't matter.  
 23 The corporation gets to decide that,  
 24 not you, and that's not relevant to  
 25 this case. And I'm directing her

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4 (Pages 10 to 13)

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1 A. COLUCCIO  
 2 not to answer. You can ask her  
 3 again, and I'm directing her not to  
 4 answer.  
 5 MR. GREIM: So is the witness  
 6 going to take the instruction not to  
 7 disclose the other people who work  
 8 with her at Golden Spring.  
 9 A Yes.  
 10 Q **Let me ask you this, did you speak**  
 11 **with any Golden Spring employees to prepare**  
 12 **yourself for today?**  
 13 A I had the privileged conversations  
 14 with Dan.  
 15 Q **Who else?**  
 16 A Employees of Golden Spring?  
 17 Q **Yes.**  
 18 A No one.  
 19 Q **Who else did you speak with to**  
 20 **prepare yourself for your testimony today?**  
 21 A Counsel for Golden Spring.  
 22 Q **Outside counsel?**  
 23 A Golden Spring's counsel, so -- I  
 24 don't understand. Sorry.  
 25 Q **That's all right, that's okay.**

Page 14

1 A. COLUCCIO  
 2 with her.  
 3 Q **Is there anyone else you spoke**  
 4 **with, they don't have to be employees,**  
 5 **officers, is there any other person you**  
 6 **spoke with in preparation for your testimony**  
 7 **today?**  
 8 A No.  
 9 Q **Now, you testified before that you**  
 10 **were the paralegal responsible for handling**  
 11 **this case on behalf of Golden Spring.**  
 12 A Right. I'm responsible in this  
 13 case specifically. Just administrative  
 14 duties, like organizing the file and  
 15 scheduling meetings.  
 16 Q **Okay. In that capacity, who are**  
 17 **the people that you deal with?**  
 18 A So I mean I deal with Dan at  
 19 Golden Spring and then I deal with attorneys  
 20 at Hodgson Russ and now attorneys at Pepper  
 21 Hamilton.  
 22 Q **Anyone else?**  
 23 A Yvette.  
 24 Not that I can think of.  
 25 Q **What about Guo Wengui or any of**

Page 16

1 A. COLUCCIO  
 2 You spoke with if Mr. Podhaskie,  
 3 he's in-house counsel?  
 4 A Right.  
 5 Q **My question is, did you speak with**  
 6 **anyone other than Mr. Podhaskie to prepare**  
 7 **for today?**  
 8 A Yeah. Just counsel for Golden  
 9 Spring, so outside counsel.  
 10 Q **So you mean Erin Teske and Mark**  
 11 **Harmon?**  
 12 A Right.  
 13 Q **Anyone else?**  
 14 A Outside of Golden Spring?  
 15 Q **Correct.**  
 16 A No.  
 17 Q **Any other attorneys other than**  
 18 **Erin Teske, Mark Harmon and Mr. Podhaskie?**  
 19 A No.  
 20 Q **You didn't speak with Yvette Wang**  
 21 **in preparation for today?**  
 22 A I did.  
 23 When you asked before, you said  
 24 any employees of Golden Spring, so that's  
 25 why I didn't include her, but yes I spoke

Page 15

1 A. COLUCCIO  
 2 his representatives?  
 3 MS. TESKE: Object to the  
 4 form.  
 5 You can answer.  
 6 THE WITNESS: Okay.  
 7 A I don't normally directly deal  
 8 with him.  
 9 Q **Do you know who does?**  
 10 MS. TESKE: Objection to the  
 11 form.  
 12 A I know.  
 13 MS. TESKE: Don't guess.  
 14 A I know Yvette updates him.  
 15 Q **How do you go about scheduling for**  
 16 **Mr. Wengui, do you do it or do you confer**  
 17 **with Yvette?**  
 18 MS. TESKE: Object to the form  
 19 of the question. She didn't say she  
 20 scheduled for the Mr. Wengui.  
 21 Q **Let me ask you, does any of your**  
 22 **scheduling or organizing of meetings relate**  
 23 **to Mr. Guo?**  
 24 MS. TESKE: Object to the form  
 25 of the question.

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5 (Pages 14 to 17)

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1 A. COLUCCIO  
 2 This is irrelevant. Get to  
 3 the point.  
 4 **Q You can answer.**  
 5 A So are you asking specifically  
 6 about this case?  
 7 **Q Sure. I'll start with this case.**  
 8 A I don't think I've done any  
 9 scheduling directly relating to him for this  
 10 case.  
 11 **Q Do you know who does?**  
 12 MS. TESKE: Objection to the  
 13 form. of the question.  
 14 Go ahead.  
 15 A I think Yvette would deal with  
 16 scheduling.  
 17 **Q Did you review any documents in  
 18 preparation for your testimony today?**  
 19 A No.  
 20 **Q Not even with counsel?**  
 21 A No.  
 22 **Q How about the Golden Spring New  
 23 York's corporate filings, did you review  
 24 those?**  
 25 A No.

Page 18

1 A. COLUCCIO  
 2 A Not that I know of.  
 3 **Q Does Yvette Wang work in that  
 4 office?**  
 5 A She is there. I know she works in  
 6 that office, yeah.  
 7 **Q Did any other entities have  
 8 offices at 162 East 64 Street?**  
 9 MS. TESKE: Object to the form  
 10 of the question.  
 11 We are so widely off of what  
 12 is relevant in this case. This is a  
 13 complete waste of time. I will give  
 14 you a little more leeway, then I'm  
 15 going to start directing her not to  
 16 answer so that we can get to the  
 17 point of the deposition and topics  
 18 directed by the Court.  
 19 A A law firm that we work with  
 20 sometimes works out of that office, but I  
 21 don't know if that's officially their  
 22 business address.  
 23 **Q Any other entities?**  
 24 A Not that I know of.  
 25 **Q Who are the other officers of**

Page 20

1 A. COLUCCIO  
 2 **Q Did you have any role in keeping  
 3 those updated?**  
 4 A The filings in this case?  
 5 **Q No.**  
 6 **Let me ask you, are you aware  
 7 whether Golden Spring New York is registered  
 8 to do business in New York?**  
 9 A Yes.  
 10 **Q Do you know how one goes about  
 11 doing that?**  
 12 A I don't know the details.  
 13 **Q Have you had any involvement with  
 14 Golden Spring New York's filings, corporate  
 15 filings in New York?**  
 16 A No.  
 17 **Q Have you ever reviewed those  
 18 filings?**  
 19 A I don't think so.  
 20 **Q Does Golden Spring New York have  
 21 any offices other than 162 East 64 Street?**  
 22 A No.  
 23 **Q Does it have any employees who  
 24 work remotely, not in the 162 East 64 Street  
 25 office?**

Page 19

1 A. COLUCCIO  
 2 Golden Spring, other than Yvette Wang?  
 3 A Guo Qiang is a director.  
 4 **Q Who is he?**  
 5 A I know that he's a --  
 6 MS. TESKE: Object to the  
 7 form.  
 8 A -- director of Golden Spring.  
 9 **Q Is he's Guo Wengui's son?**  
 10 A I think so.  
 11 **Q Have you ever met Guo Qiang?**  
 12 A I think so.  
 13 **Q Where did you meet him?**  
 14 A He came to our office once.  
 15 **Q When was that?**  
 16 A I don't remember exactly. Maybe  
 17 last month.  
 18 **Q Did you ask to meet with him to  
 19 prepare for your deposition today?**  
 20 A No.  
 21 **Q Do you know whether Guo Qiang  
 22 gives direction to Yvette Wang as president?**  
 23 MS. TESKE: Object to the form  
 24 of the question.  
 25 You can answer, if you know.

Page 21

6 (Pages 18 to 21)

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1 A. COLUCCIO  
 2 A No.  
 3 Q **Do you know whether Yvette Wang**  
 4 **gives direction to Guo Qiang?**  
 5 A No.  
 6 Q **What are his duties as director of**  
 7 **Golden Spring?**  
 8 A I don't know.  
 9 Q **What are Yvette Wang's duties as**  
 10 **president of Golden Spring?**  
 11 A I don't know.  
 12 Q **Did you ask her?**  
 13 A No.  
 14 Q **I've got to ask you, when did you**  
 15 **meet with Ms. Wang to prepare for your**  
 16 **deposition today?**  
 17 A Yesterday.  
 18 Q **When?**  
 19 A About 4 p.m.  
 20 Q **Was that meeting here at this**  
 21 **office?**  
 22 A Yes.  
 23 Q **I didn't see you. We were taking**  
 24 **depositions here yesterday.**  
 25 **How long did you meet with her?**

Page 22

1 A. COLUCCIO  
 2 A It was I believe either Wednesday  
 3 or Thursday of last week.  
 4 Q **Who told you?**  
 5 MS. TESKE: Objection to the  
 6 form of the question.  
 7 You can answer.  
 8 A Dan.  
 9 Q **Other than the hour-long meeting**  
 10 **last night, is there anything else you did**  
 11 **to prepare yourself since Wednesday or**  
 12 **Thursday for your deposition today?**  
 13 A Last night I just kind of reviewed  
 14 information on my own.  
 15 Q **After the meeting?**  
 16 A Yeah.  
 17 Q **What did you review?**  
 18 A Just my notes from the meeting.  
 19 Q **Did these notes consist of things**  
 20 **that counsel told you to say today?**  
 21 A No.  
 22 MS. TESKE: Object to the form  
 23 of the question.  
 24 Q **Did the notes consist of basic**  
 25 **information about Golden Spring?**

Page 24

1 A. COLUCCIO  
 2 A Probably about maybe an hour.  
 3 Q **Who else was present -- well, was**  
 4 **anyone else present for that meeting?**  
 5 A Yes.  
 6 Q **Who was that?**  
 7 A Erin Teske and Mark Harmon.  
 8 Q **How Mr. Podhaskie.**  
 9 A He came in at the end. I think we  
 10 might have been pretty much done talking at  
 11 that point.  
 12 Q **All right. Did you have any other**  
 13 **meetings with Ms. Wang to prepare for your**  
 14 **testimony today?**  
 15 A No.  
 16 Q **Did you have any other meetings**  
 17 **with Ms. Teske or Mr. Harmon to prepare for**  
 18 **your testimony today?**  
 19 A No.  
 20 Q **Did you ever have any other**  
 21 **meeting with Mr. Podhaskie to prepare for**  
 22 **your testimony today?**  
 23 A No.  
 24 Q **When did you learn that you would**  
 25 **be a 30B6 witness?**

Page 23

1 A. COLUCCIO  
 2 MS. TESKE: Object to the form  
 3 of the question.  
 4 You can answer.  
 5 A Yes.  
 6 Q **Do you have the notes with you**  
 7 **today?**  
 8 A No.  
 9 Q **How many pages of notes? Were**  
 10 **they handwritten notes?**  
 11 A No.  
 12 Q **Are they notes that you took?**  
 13 A Yes.  
 14 Q **Did you type them up while during**  
 15 **the meeting?**  
 16 A Yes.  
 17 Q **How many pages of notes did you**  
 18 **type up?**  
 19 A I believe.  
 20 MS. TESKE: Object to the form  
 21 of the question.  
 22 A I believe just one.  
 23 Q **Are you relying on those notes for**  
 24 **your testimony today?**  
 25 MS. TESKE: Object to the form

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7 (Pages 22 to 25)

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<p>1 A. COLUCCIO 2 of the question. 3 A Yes. <b>Q What's the factual information</b> <b>5 that was in the notes?</b> 6 MS. TESKE: Object. 7 Do you have specific questions 8 for her 'cause she's not going to 9 the relay to you the hour-long 10 conversation that she had with 11 Yvette. You can ask her questions 12 and obtain that information. She 13 doesn't have her notes with you, she 14 can't read it. 15 MR. GREIM: Well, maybe she 16 should have brought them. 17 MS. TESKE: No. <b>Q My question is simply, right now</b> <b>19 what is the factual information you can</b> <b>20 remember from the notes?</b> 21 <b>And then we'll go through it and</b> 22 <b>fill in the gaps.</b> 23 MS. TESKE: I'm objecting to 24 the form of the question. And 25 telling you that you can ask her</p>	<p>1 A. COLUCCIO 2 not to answer that question. You 3 can ask other specific questions to 4 get at that information. 5 MR. GREIM: And to be very 6 clear this is information the 7 witness says she is relying on 8 today, it's factual information, 9 she's being instructed not to 10 answer, not to disclose what it is. 11 <b>Q By the way, when you were hired</b> 12 <b>with Golden Spring, were you told that one</b> 13 <b>of your duties would be testifying as a</b> 14 <b>corporate rep for Golden Spring?</b> 15 A No. 16 <b>Q Have you ever testified as a</b> 17 <b>corporate rep for Golden Spring in any other</b> 18 <b>case?</b> 19 A No. 20 <b>Q Have you read any of the</b> 21 <b>testimonies of any transcripts of the</b> 22 <b>testimony of any of the witness in this</b> 23 <b>case?</b> 24 A Yes. <b>Q Which witnesses?</b></p>
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<p>1 A. COLUCCIO  2 before Halloween, okay. We got the  3 transcript the following week, so did you  4 skim it this week?  5 A No. It might have been last week.  6 Q <b>Was it after someone told you that</b>  7 <b>you had to be the 30B6 witness?</b>  8 A No.  9 Q <b>So it was before that?</b>  10 A Yeah.  11 Q <b>I mean is it one out of your work</b>  12 <b>duties to skim the transcript?</b>  13 MS. TESKE: Object to the form  14 of the question.  15 She did not review it in  16 preparation for this deposition.  17 Move on?  18 MR. GREIM: Please answer the  19 question.  20 MS. TESKE: No, don't answer  21 the question. It's irrelevant.  22 MR. GREIM: No, no, wait a  23 minute. This is one of the only  24 things this witness might know about  25 this case and she apparently skimmed</p>	<p>1 A. COLUCCIO  2 Spring, you're not going to be relying on  3 anything from the Yvette Wang deposition  4 transcript; Is that correct?  5 A Correct.  6 Q <b>Are you familiar with the concept</b>  7 <b>of pleadings in a case?</b>  8 A Yes.  9 Q <b>Have you read the pleadings in</b>  10 <b>this case?</b>  11 A Again, when I first started, I  12 might have skimmed them, but I haven't  13 thoroughly read them.  14 Q <b>When's last time that you read any</b>  15 <b>filings in this case?</b>  16 A I don't know.  17 Q <b>Let's switch gears for a second</b>  18 <b>and talk about documents. Go to page four</b>  19 <b>of the subpoena and let's look at item</b>  20 <b>number one. Any and all documents relating</b>  21 <b>to Golden Springs and/or Yvette Wang's work</b>  22 <b>on behalf of Eastern Profit, Guo Wengui or</b>  23 <b>any other person or entity with respect to</b>  24 <b>the litigation between Eastern Profits or</b>  25 <b>Strategic Vision.</b></p>
Page 30	Page 32
<p>1 A. COLUCCIO  2 the transcript. I want to know why  3 she did it.  4 MS. TESKE: It doesn't matter  5 why she did it.  6 MR. GREIM: It sure does.  7 MS. TESKE: She did it before  8 she was designated as a corporate  9 representative.  10 I'm telling you not to answer  11 the question.  12 Q <b>Let's try this, do you remember</b>  13 <b>anything from what you read?</b>  14 MS. TESKE: I'm directing you  15 not to answer that question.  16 MR. GREIM: I'd like an answer  17 to that question.  18 Q <b>Do you remember anything from the</b>  19 <b>transcript of Yvette Wang?</b>  20 MS. TESKE: You can answer  21 that question. If you remember  22 specific facts from that deposition,  23 you can answer it.  24 A No.  25 Q <b>Okay. So as the 30B6 for Golden</b></p>	<p>1 A. COLUCCIO  2 Do you see that?  3 A Yes.  4 Q <b>Who looked for those documents?</b>  5 A Which? Are you referring to  6 actual documents that were produced?  7 Q <b>I'm referring to documents that</b>  8 <b>are listed under number one. My question</b>  9 <b>is, well met let me ask you, did Golden</b>  10 <b>Spring conduct a search for those documents?</b>  11 A For today?  12 Q <b>Any time.</b>  13 A I don't know. I don't.  14 Q <b>Did they conduct a search for</b>  15 <b>today?</b>  16 A Not that I know of.  17 Q <b>Do you know whether any documents</b>  18 <b>that are described in item one there exist?</b>  19 A I don't know.  20 Q <b>Same thing, number two. Any and</b>  21 <b>all audio or video recordings containing</b>  22 <b>statements of Guo, Wang, Han Chunguang or</b>  23 <b>Lianchao Han regarding reflecting</b>  24 <b>representations, Golden Spring or its</b>  25 <b>agents, major Strategic Vision in the course</b></p>

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1 A. COLUCCIO  
2 of negotiation of the contracted issue.  
3 Do you see that?  
4 A Yes.  
5 Q **Do you know whether any such**  
6 **recordings exist?**  
7 A As far as I know, they do not  
8 exist.  
9 Q **What have you done to satisfy**  
10 **yourself that they don't exist?**  
11 A I know from my conversations with  
12 Yvette that there are no recordings.  
13 Q **When were those conversations?**  
14 A Just yesterday.  
15 Q **What did Golden Spring do to look**  
16 **for the recordings?**  
17 A I don't think they had to do  
18 anything to look for them because they knew  
19 they were nonexistent.  
20 Q **How did they know?**  
21 A Because there's no equipment that  
22 is recording these conversations.  
23 Q **Did they check with Mr. Guo?**  
24 MS. TESKE: Object to the form  
25 of the question, but you can answer.

1 A. COLUCCIO  
2 **Q Now, are you familiar with an**  
3 **entity called Guo Media?**  
4 MS. TESKE: Object to the  
5 form. of the question, you don't  
6 need to answer that.  
7 **Q Does Guo Media have audio**  
8 **recording equipment?**  
9 MS. TESKE: Object to the  
10 scope of the question.  
11 Don't answer that.  
12 **Q Does Guo Media have audio**  
13 **recording equipment at 162 East 64th Street?**  
14 MS. TESKE: Object to the  
15 scope of the question.  
16 Don't answer that.  
17 If you have other questions  
18 about Guo Media the direction is  
19 going to be the same. I suggest we  
20 move on to the topics that are  
21 allowed by the court order.  
22 MR. GREIM: But wait a second.  
23 The witness just said that there's  
24 no audio or video recording  
25 equipment at 162 East 64th Street.

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1 A. COLUCCIO  
2 A I don't know.  
3 **Q When you say there's no equipment,**  
4 **what do you mean?**  
5 A There's no audio recording  
6 equipment at our office.  
7 **Q Was there any audio recording**  
8 **equipment at 800 Fifth Avenue?**  
9 A No.  
10 **Q Do you know that personally or is**  
11 **that something that Yvette told you?**  
12 A Yvette told me. But from when I  
13 was there, I didn't see any.  
14 **Q Did Golden Spring check with**  
15 **Mr. Guo to see if he had audio or video**  
16 **recordings?**  
17 MS. TESKE: Object to the  
18 form. You can answer.  
19 A I don't know.  
20 **Q Did you ask that of Yvette last**  
21 **night?**  
22 A No.  
23 **Q Do you know whether Yvette**  
24 **checked?**  
25 A I don't know.

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10 (Pages 34 to 37)

**30(b)(6): Amelia Coluccio  
November 12, 2019**

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1 A. COLUCCIO  
 2 Do not answer.  
 3 **Q Is it within the Golden Spring New**  
 4 **York office?**  
 5 MS. TESKE: Yeah. Object to  
 6 the question, you don't need to  
 7 answer that.  
 8 You're absolutely right.  
 9 MR. GREIM: Wait a second,  
 10 these are documents that had to be  
 11 produced today. One of the topics  
 12 is the documents described below  
 13 whether or not produced.  
 14 MS. TESKE: Actually what  
 15 needs to be produced is anything  
 16 within the time period that's  
 17 relevant. They weren't even in  
 18 these offices during the time period  
 19 that's relevant. So she's not going  
 20 to answer that question. If you  
 21 have a different question about  
 22 Golden Spring and its conversations  
 23 and communications with Eastern and  
 24 Mr. Guo as far as those concerned  
 25 the contracted at issue in this

1 A. COLUCCIO  
 2 64th Street?  
 3 A No.  
 4 **Q And you know that because Yvette**  
 5 **Wang told you?**  
 6 A Yes.  
 7 **Q Does Golden Spring New York have**  
 8 **access to recordings audio or video**  
 9 **recordings that are not stored physically at**  
 10 **its office?**  
 11 MS. TESKE: Object to the form  
 12 of the question.  
 13 I have no idea what that  
 14 question is asking. If you do, you  
 15 can attempt it.  
 16 MR. GREIM: I'm going to ask  
 17 the coaching of the witness, which  
 18 is blatant come to an end.  
 19 MS. TESKE: If you want to ask  
 20 questions that concern the topics in  
 21 the Court's order, feel free. If  
 22 you're going to continue to ask  
 23 questions about Guo Media and  
 24 communications that exist or  
 25 recordings that exist outside the

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Page 40

1 A. COLUCCIO  
 2 case, negotiating, executing,  
 3 performance thereof, per the Court's  
 4 order, please ask the witness now.  
 5 **Q Let me ask you this, does Guo**  
 6 **Media keep copies of recordings in its**  
 7 **office?**  
 8 MS. TESKE: Objection to the  
 9 form of the question.  
 10 Do not answer it.  
 11 She is not here to answer  
 12 questions about Guo Media. She is  
 13 here to answer questions about  
 14 Golden Spring New York during  
 15 relevant time period in so far as  
 16 those communications with Eastern  
 17 and Mr. Guo concerned the contract  
 18 at issue in this case. If you have  
 19 questions concerning that topic,  
 20 please ask them.  
 21 **Q Does Golden Spring New York**  
 22 **have -- I'm setting aside the question**  
 23 **whether they have recording equipment.**  
 24 **My question now is whether they**  
 25 **have recordings at their office, 162 East**

1 A. COLUCCIO  
 2 relevant time period, concerning the  
 3 relevant topics, move on Eddy.  
 4 She's not answering them.  
 5 MR. GREIM: Please calm down  
 6 and stop interrupting the  
 7 deposition.  
 8 MS. TESKE: I'm perfectly  
 9 calm. I'm sitting in my chair and I  
 10 continue to keep interrupt --  
 11 MR. GREIM: You're  
 12 interrupting.  
 13 MS. TESKE: I will continue to  
 14 interrupt you.  
 15 MR. GREIM: No, you won't.  
 16 MS. TESKE: I will.  
 17 MR. PODHASKIE: I will end the  
 18 deposition. Move on.  
 19 MR. GREIM: Mr. Podhaskie  
 20 needs to be quiet too.  
 21 MS. TESKE: I will continue to  
 22 interrupt the deposition so long as  
 23 you are not abiding by the Court's  
 24 order and asking question outside  
 25 the scope of the Court's order, I

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11 (Pages 38 to 41)

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A. COLUCCIO  
work that she did on the Eastern Profit  
contract not as president as Golden Spring;  
in other words, individually or as an  
officer of some other entity?

A I believe --  
MS. TESKE: Object to the form of the question. Object to the scope of the question. The witness is here to testify as to GSNY's conversations, work, communications with Eastern and Mr. Guo as it concerns the contract. Not to any relationship or work that Ms. Wang may have had individually.

MR. GREIM: What we're trying to do is find out whether there's anything in that individual category. Golden Spring ought to know whether its president was doing anything on this contract not as president of Golden Spring.

**Q So that's my question to you, was she?**

MS. TESKE: Object to the

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Page 43

A. COLUCCIO  
scope.

You can answer.

A I don't think so.

**Q And where does your information for your answer come from?**

A From my conversations with Yvette.

**Q So did Yvette tell you that everything that she did on the Eastern Profit contract was as president of Golden Spring New York.**

### MS. TESKE: Object to the form

MS. TESKE. Object to the form of the question.

You can answer

don't know if she said those

exact words, but yes, I do know that she was acting as president of GSNY.

**Q** Is it Golden Spring's answer that everything that Yvette Wang did on the contract with Eastern Profit was as its president?

MS. TESKE: Object to the scope of the question.

The witness is here to testify as to GSNY's communications and work

## as to CEN's communications and work

12 (Pages 42 to 45)

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1 A. COLUCCIO  
2 performed with Eastern and Mr. Guo  
3 concerning the contract. GSNY does  
4 not know, nor should it, what  
5 Ms. Wang did in her individual  
6 capacity.  
7 MR. GREIM: Well, now let's  
8 not testify for Golden Spring,  
9 counsel. Let's find out what Golden  
10 Spring know.  
11 MS. TESKE: I'm telling you,  
12 Mr. Greim the scope of the order and  
13 what Golden Spring is directed to  
14 answer at this depositions. It is  
15 not directed to answer questions  
16 about how Ms. Wang acted  
17 individually in her individually  
18 capacity. You had two opportunities  
19 to depose Ms. Wang on two full days.  
20 If you had those questions for  
21 Ms. Wang, you could have asked  
22 Ms. Wang. You have a deponent for  
23 Golden Spring who is prepared to  
24 testify as to Golden Spring's  
25 communications and work with Eastern

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Page 47

1 A. COLUCCIO

2 **Q When did Golden Spring first learn**

3 **of Eastern Profit's existence?**

4 MS. TESKE: Beyond the scope.

5 You can answer, if you know.

6 A I'm not sure.

7 **Q Did you discuss that with Ms. Wang**

8 **last night?**

9 A Did I discuss exactly when they

10 came to know of Eastern Profit?

11 **Q Um-hmm?**

12 A No.

13 **Q Did you discuss generally when**

14 **Golden Spring came to learn that there was**

15 **such a thing as Eastern Profit?**

16 A Yeah. Eastern Profit had been a

17 client of Golden Spring.

18 **Q Really. Before the contract at**

19 **issue here?**

20 A Yeah.

21 **Q And in what capacity had Eastern**

22 **Profit been a client of Golden Spring?**

23 MS. TESKE: Object.

24 Don't answer.

25 **Q What was Golden Spring doing for**

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1 A. COLUCCIO  
2 Eastern Profit?  
3 MS. TESKE: Object.  
4 Don't answer.  
5 **Q You taking counsel's instruction**  
6 **not to answer that question.**  
7 A Yes.  
8 **Q Do you have any idea the general**  
9 **timeframe when Golden Spring was working for**  
10 **Eastern Profit before the --**  
11 MS. TESKE: Object.  
12 **Q -- contract at issue here?**  
13 MS. TESKE: Object.  
14 Don't answer.  
15 **Q Actually I'm going to go back on**  
16 **this because if you look at topic number**  
17 **two, in Exhibit A. Topic two I guess I**  
18 **better read.**  
19 **It says, "the ownership,**  
20 **management governance and structure of**  
21 **Golden Spring between 1/1/17 and 7/1/19,**  
22 **including without limitation, who worked for**  
23 **Golden Spring and how they were paid or the**  
24 **particular witnesses are employed by Golden**  
25 **Spring and, if so, their respective**

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<p>1 A. COLUCCIO  2 positions, whether Eastern Profit, Guo  3 Wengui, or any other person paid Golden  4 Spring for its work, what families Golden  5 Spring does work for now or in the past,  6 what kind of work Golden Spring does, Golden  7 Spring's ownership and organizational  8 structure", and decided to the Court's  9 order. Docket 189, page three, note one and  10 page ten.</p> <p>11 So my question is, and I think I'm  12 entitled to know -- let's keep it to the  13 timeframe, okay.</p> <p>14 So after January 1 2017 --</p> <p>15 MS. TESKE: Which is when the  16 contract was executed in this case.</p> <p>17 MR. GREIM: Wrong. No.  18 Please don't interrupt, okay.</p> <p>19 <b>Q After January 1, 2017, what work</b>  20 <b>did Golden Spring do for Eastern Profit?</b></p> <p>21 MS. TESKE: I'm telling the  22 witness not to answer because your  23 topics are limited by the Court's  24 orders, which has specifically  25 tailored that to as it concerns the</p>	<p>1 A. COLUCCIO  2 MS. TESKE: On this matter.  3 A At the end of 2017.  4 <b>Q When did at the end of 2017?</b>  5 A I don't know, exactly.  6 <b>Q What did Yvette tell you?</b>  7 A About how they started to work  8 together?  9 <b>Q No, about when.</b>  10 A Oh, just end of 2017.  11 <b>Q Is it in December of 2017?</b>  12 A I didn't get a specific month.  13 <b>Q I guess you didn't get a time</b>  14 <b>within December 2017, correct?</b>  15 A Correct.  16 <b>Q How do you know that the end</b>  17 <b>of 2017 is an accurate answer to my</b>  18 <b>question?</b>  19 MS. TESKE: Asked and  20 answered.  21 You can answer again.  22 A From my conversation with Yvette.  23 <b>Q Have you looked for any written</b>  24 <b>documentation of the Golden Spring Eastern</b>  25 <b>Profit relationship related to this</b></p>
<p>Page 50</p>	<p>Page 52</p>
<p>1 A. COLUCCIO  2 contract.  3 MR. GREIM: We'll just mark  4 this and we'll come back to it. I  5 think that's incorrect.  6 MS. TESKE: I can read you the  7 Court's order right now, which  8 actually says, "defendant may ask  9 Golden Springs witness about its  10 dealings with the plaintiff, that  11 would be Eastern, during the  12 specified period, but so as to keep  13 the deposition focused on issues  14 relevant to the party's claims and  15 defenses, only in so far as those  16 dealings relate to the negotiations,  17 execution or performance of the  18 contract at issue."</p> <p>19 <b>Q Let me ask you this, before Golden</b>  20 <b>Spring began to work with Eastern Profit</b>  21 <b>on -- well, let me back up.</b>  22 <b>When did Golden Spring begin to</b>  23 <b>work for Eastern Profit on --</b>  24 MS. TESKE: Object --  25 <b>Q -- on this matter?</b></p>	<p>1 A. COLUCCIO  2 contract?  3 A No.  4 <b>Q Do you know whether one exist?</b>  5 A No.  6 <b>Q What were the terms of Golden</b>  7 <b>Spring's work for Eastern Profit regarding</b>  8 <b>this contract?</b>  9 A Eastern Profit gave Yvette, told  10 Yvette that Eastern Profit would enter into  11 the contract.  12 <b>Q Okay. I better be a little more</b>  13 <b>clear. Well, actually let's go with that,</b>  14 <b>then we'll come back to the question I asked</b>  15 <b>you. Okay?</b>  16 A Okay.  17 <b>Q When did Eastern Profit tell</b>  18 <b>Yvette that it would enter into the research</b>  19 <b>agreement in this case?</b>  20 A At the end of 2017.  21 <b>Q When at the end of 2017?</b>  22 A That's just at the end of 2017.  23 That's all I know.  24 <b>Q Who from Eastern Profit told</b>  25 <b>Yvette that it would enter into this</b></p>

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1 A. COLUCCIO  
 2 contract?  
 3 A Mr. Han.  
 4 Q **Who is he?**  
 5 A He is the former director of  
 6 Eastern Profit.  
 7 Q **Did Golden Spring understand that**  
 8 **Mr. Han had authority to give direction to**  
 9 **Golden Spring on behalf of Eastern Profit?**  
 10 A Yes.  
 11 Q **How?**  
 12 A Because Golden Spring knew that he  
 13 was the director of Eastern Profit.  
 14 Q **But as you just testified he was**  
 15 **really the former director at the time,**  
 16 **wasn't he?**  
 17 MS. TESKE: Objection to the  
 18 form of the question.  
 19 You can answer.  
 20 A No. I was saying former as in  
 21 he's not currently right now the director of  
 22 Eastern Profit.  
 23 Q **Oh, I see. So did Golden Spring**  
 24 **New York think that at the end of 2017**  
 25 **Mr. an was the director of Eastern Profit?**

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1 A. COLUCCIO  
 2 agreement. Let's go back a little bit to  
 3 the beginning of Golden Spring's work for  
 4 Eastern Profit on the research agreement.  
 5 Okay?  
 6 Who came to who? Did Eastern  
 7 Profit come to Golden Spring asking for help  
 8 or did Golden Spring go to Eastern Profit?  
 9 A Golden Spring went to Eastern  
 10 Profit.  
 11 Q **And who are the natural people who**  
 12 **were involved there? Was it Yvette Wang**  
 13 **going to Mr. Han?**  
 14 A Correct.  
 15 Q **Did Ms. Wang approach Mr. Han in**  
 16 **person or by phone or by email? How did**  
 17 **that contact occur?**  
 18 A I don't, I don't know.  
 19 Q **So at the time that Golden Spring**  
 20 **approached Eastern Profit, what did Golden**  
 21 **Spring know about the proposed project?**  
 22 A So I think I'm might have said  
 23 something wrong. When Golden Spring  
 24 approached Mr. Han, I don't know if it was  
 25 was specifically asking about Eastern Profit. I

Page 54

1 A. COLUCCIO  
 2 A I believe so.  
 3 Q **Do you know how it came to that**  
 4 **understanding?**  
 5 A I'm not sure.  
 6 Q **You know who knows the answer to**  
 7 **that question?**  
 8 A No.  
 9 Q **Would Yvette know the answer?**  
 10 A I don't know.  
 11 Q **Did you ask her?**  
 12 A No.  
 13 Q **Who were the various employees or**  
 14 **officers of Golden Spring who dealt with**  
 15 **Eastern Profit on the research agreement at**  
 16 **issue?**  
 17 A Just Yvette.  
 18 Q **So if you were going to try to get**  
 19 **an answer to the question I just asked you a**  
 20 **moment ago, would you go to anyone else**  
 21 **other than Yvette an answer to that**  
 22 **question?**  
 23 A No.  
 24 Q **So let's talk about, I**  
 25 **fast-forwarded a little bit to the research**

Page 55

1 A. COLUCCIO  
 2 think Golden Spring just went to Mr. Han  
 3 about this research agreement asking if  
 4 Mr. Han had a company that could enter into  
 5 it.  
 6 Q **I see, I see.**  
 7 **So, but you testified that Golden**  
 8 **Spring was already working with Eastern**  
 9 **Profit on some other project, right?**  
 10 A Yeah.  
 11 Q **Before this?**  
 12 A Yeah.  
 13 Q **So did Golden Spring already know**  
 14 **that Mr. Han had some role with Eastern**  
 15 **Profit when it approached him?**  
 16 A I think so.  
 17 Q **How do you know the answer to that**  
 18 **question?**  
 19 A I think that -- I'm actually not  
 20 sure. I don't know. I guess I was just  
 21 thinking that they would have known who the  
 22 former director of Eastern Profit was.  
 23 Q **So did Mr. Han still have any role**  
 24 **with Eastern Profit when Ms. Wang approached**  
 25 **him?**

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15 (Pages 54 to 57)

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1 A. COLUCCIO  
 2 A Yes. I think so.  
 3 **Q Okay. And I think you testified**  
 4 **earlier that Golden Spring understood**  
 5 **Mr. Han to be at that time still the**  
 6 **director of Eastern Profit, right?**  
 7 A Yeah, I think so.  
 8 **Q Let me ask you this, why did**  
 9 **Golden Spring approach Mr. Han?**  
 10 A To see if he knew of any company  
 11 that could enter into this research  
 12 agreement.  
 13 **Q Why did Golden Spring believe**  
 14 **Mr. Han would be a fruitful source of a**  
 15 **potential candidate companies for the**  
 16 **agreement?**  
 17 A I don't know.  
 18 **Q Well, what did Golden Spring know**  
 19 **about Mr. Han when it approached him?**  
 20 A I'm not sure.  
 21 **Q Who knows the answer to that**  
 22 **question?**  
 23 MS. TESKE: Object to the  
 24 form.  
 25 You can answer.

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1 A. COLUCCIO  
 2 of the question.  
 3 A Maybe.  
 4 **Q Well, let's keep moving ahead.**  
 5 **Oh, by the way, did Golden Spring**  
 6 **New York know whether Guo Mai (phonetic) had**  
 7 **any role with Eastern Profit when it**  
 8 **approached Mr. Han?**  
 9 MS. TESKE: Object to the form  
 10 of the question.  
 11 You can answer, if you know.  
 12 A I don't know.  
 13 **Q Did Guo Mai have any role with**  
 14 **Eastern Profit when Golden Spring approached**  
 15 **Mr. Han?**  
 16 MS. TESKE: Object to the form  
 17 of the question. This is way beyond  
 18 the scope.  
 19 If you have any idea, you can  
 20 answer.  
 21 A I don't know.  
 22 **Q What was discussed in that first**  
 23 **exchange between Ms. Wang and Mr. Han?**  
 24 A Yvette told Mr. Han about the  
 25 research that Golden Spring was looking to

Page 60

1 A. COLUCCIO  
 2 A I guess Yvette would.  
 3 **Q Did Golden Spring tell Mr. Han**  
 4 **that the negotiations were supposed to be**  
 5 **confidential?**  
 6 MS. TESKE: Object to the form  
 7 of the question.  
 8 You can answer.  
 9 A I don't know.  
 10 **Q Did Golden Spring tell Mr. Han**  
 11 **that Ms. Wang had promised Strategic Vision**  
 12 **that the only people involved with the**  
 13 **contract would be Lianchao Han, Yvette Wang,**  
 14 **Mr. Guo and Strategic Vision?**  
 15 A I don't know.  
 16 **Q Who knows the answer to that**  
 17 **question?**  
 18 A I don't know.  
 19 **Q I guess your testimony is the only**  
 20 **person who dealt with Eastern Profit for**  
 21 **Golden Spring was Yvette?**  
 22 A Correct.  
 23 **Q So if anyone knows it would have**  
 24 **to be Yvette, right?**  
 25 MS. TESKE: Object to the form

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1 A. COLUCCIO  
 2 do, and Mr. Han advised that Eastern Profit  
 3 could enter into the contract.  
 4 **Q Well, what was Golden Spring's**  
 5 **understanding about the research that it was**  
 6 **looking to do when it approached Mr. Han?**  
 7 A It was looking to do research on  
 8 the CCP.  
 9 **Q For what reason?**  
 10 A I'm not sure.  
 11 **Q Well, did Golden Spring have some**  
 12 **reason for wanting to do research into the**  
 13 **CCP?**  
 14 A I'm not sure.  
 15 **Q If Golden Spring wanted to do this**  
 16 **research, why did it approach anyone else?**  
 17 **Why didn't it just do the research itself?**  
 18 A Well, they wanted to hire an  
 19 investigation company.  
 20 **Q Right.**  
 21 A To do the research.  
 22 **Q So why didn't Golden Spring just**  
 23 **hire the investigation company? Why did**  
 24 **they try to find someone else to hire the**  
 25 **investigation company?**

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16 (Pages 58 to 61)

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1 A. COLUCCIO  
 2 A Golden Spring wasn't in a position  
 3 to enter into a contract as a party.  
 4 **Q Why not?**  
 5 A I don't know.  
 6 **Q How do you know that they weren't**  
 7 **in a position to enter into a contract as a**  
 8 **party?**  
 9 A From my conversation with Yvette.  
 10 **Q This is from last night?**  
 11 A Yeah.  
 12 **Q So she didn't tell you why they**  
 13 **weren't in a position to enter into a**  
 14 **contract as a party?**  
 15 A No.  
 16 **Q Golden Spring is licensed to do**  
 17 **business in New York, right?**  
 18 A Yes.  
 19 **Q They're registered here as a**  
 20 **foreign corporation?**  
 21 A Golden Spring is registered in the  
 22 US.  
 23 **Q Right.**  
 24 **Let me back up. You know, when**  
 25 **you say a corporation is registered as a**

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1 A. COLUCCIO  
 2 **Q Okay, okay. Do you know of any**  
 3 **reason why Golden Spring could not just**  
 4 **enter into the contract itself?**  
 5 A No.  
 6 **Q Well, we'll do the best we can**  
 7 **here. We'll keep forging ahead.**  
 8 **Did Mr. Han tell Golden Spring**  
 9 **whether it was going to be able to actually**  
 10 **pay for the research work under this**  
 11 **contract?**  
 12 MS. TESKE: Object to the  
 13 form.  
 14 You can answer.  
 15 A Pay for the research work. I  
 16 don't know.  
 17 **Q Did Mr. Han tell Golden Spring**  
 18 **whether Eastern Profit could pay Golden**  
 19 **Spring for its work?**  
 20 A Yes.  
 21 **Q What did he say?**  
 22 A He said that -- I'm sorry. He  
 23 said Golden Spring New York would be  
 24 compensated by Eastern Profit if the  
 25 agreement was successful.

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1 A. COLUCCIO  
 2 foreign corporation, do you understand that  
 3 means that they are actually formed under  
 4 the law of another state and they're  
 5 registered to do business in another state  
 6 they're called a foreign corporation, right?  
 7 Not foreign as in from outside the US, but  
 8 foreign as in formed under the laws from  
 9 another state, do you understand that?  
 10 A Okay.  
 11 **Q Under the laws of what other state**  
 12 **is Golden Spring New York formed?**  
 13 A I thought it was under New York.  
 14 **Q Okay. Do you know the answer to**  
 15 **that question?**  
 16 MS. TESKE: Asked and  
 17 answered.  
 18 A (No verbal response given.)  
 19 **Q Do you know the answer to that**  
 20 **question?**  
 21 MS. TESKE: Asked and  
 22 answered.  
 23 **Q You can answer it?**  
 24 A Well, I just told you what I  
 25 thought.

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1 A. COLUCCIO  
 2 **Q Did he say this right away in the**  
 3 **first discussion or was this in a later**  
 4 **discussion?**  
 5 A I'm not sure.  
 6 **Q Did it take sometime for Eastern**  
 7 **Profit and Golden Spring to make their deal**  
 8 **about Golden Spring working for Eastern**  
 9 **Profit here?**  
 10 MS. TESKE: Objection to the  
 11 form of the question.  
 12 You can answer.  
 13 A I'm not sure.  
 14 **Q Did it take a couple of days to**  
 15 **negotiate the terms out?**  
 16 A I don't know how long it took.  
 17 **Q So you don't know other than the**  
 18 **end of 2017 when this first approach from**  
 19 **Ms. Wang to Mr. Han took place and you don't**  
 20 **know how many days it took or if it even**  
 21 **took multiple days to hammer out the Eastern**  
 22 **Profit Golden Spring agreement, correct?**  
 23 MS. TESKE: Object to the form  
 24 of the question.  
 25 You can answer.

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17 (Pages 62 to 65)

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<p>1 A. COLUCCIO</p> <p>2 A Correct.</p> <p>3 Q <b>Who knows the answer to those</b></p> <p>4 <b>questions?</b></p> <p>5 A I would think Yvette would know.</p> <p>6 Q <b>Did you ask her last night?</b></p> <p>7 A (No verbal response.)</p> <p>8 Q <b>And you haven't looked for any</b></p> <p>9 <b>writing that reflects the terms of this</b></p> <p>10 <b>agreement?</b></p> <p>11 MS. TESKE: Object to the form</p> <p>12 of the question.</p> <p>13 You can answer.</p> <p>14 A Correct.</p> <p>15 Q <b>Why did Golden Spring agree --</b></p> <p>16 <b>well, let me go back.</b></p> <p>17 You said Mr. Han told Golden</p> <p>18 Spring it would be compensated if the</p> <p>19 agreement was successful; what did it mean</p> <p>20 for the agreement to be successful?</p> <p>21 A I'm not sure.</p> <p>22 Q <b>Does Golden Spring know?</b></p> <p>23 A I don't know.</p> <p>24 Q <b>I mean was success defined as</b></p> <p>25 <b>regime change in China? Was it defined as</b></p>	<p>1 Page 66</p>	<p>1 A. COLUCCIO</p> <p>2 some of Guo's assets get unfrozen; what was</p> <p>3 the definition?</p> <p>4 A I don't know.</p> <p>5 Q <b>Does Golden Spring know?</b></p> <p>6 A I don't know.</p> <p>7 Q <b>Let's turn to the other half of</b></p> <p>8 <b>the agreement. How much would Golden Spring</b></p> <p>9 <b>be compensated if the agreement was</b></p> <p>10 <b>successful?</b></p> <p>11 A I don't think that was decided on.</p> <p>12 Q <b>How do you know that?</b></p> <p>13 A From my conversation with Yvette.</p> <p>14 Q <b>So did Yvette tell you the amount</b></p> <p>15 <b>of the compensation wasn't decided on?</b></p> <p>16 A Correct.</p> <p>17 Q <b>By the way in this discussion with</b></p> <p>18 <b>Yvette, did you have a chance to ask her</b></p> <p>19 <b>question or did she just kind of march</b></p> <p>20 <b>through the points with you?</b></p> <p>21 A I might have asked her, what, a</p> <p>22 couple of questions.</p> <p>23 Q <b>Do you remember any question that</b></p> <p>24 <b>you asked her?</b></p> <p>25 A Right now, I can't.</p>
		<p>1 A. COLUCCIO</p> <p>2 Q <b>As we're going if you remember</b></p> <p>3 <b>something you're telling me was a question</b></p> <p>4 <b>you asked her, please let me know. If you</b></p> <p>5 <b>can remember, okay?</b></p> <p>6 A Okay.</p> <p>7 Q <b>And you were typing up notes as</b></p> <p>8 <b>Ms. Wang was talking with you; was that</b></p> <p>9 <b>right?</b></p> <p>10 A Yes.</p> <p>11 MR. GREIM: I'm going to call</p> <p>12 for production of those notes.</p> <p>13 MS. TESKE: We will object.</p> <p>14 Q <b>Okay. What about there's one more</b></p> <p>15 <b>piece of this I didn't ask you about.</b></p> <p>16 <b>What was the timeline discussed?</b></p> <p>17 In other words, at what point was Golden</p> <p>18 Spring going to look back and Eastern Profit</p> <p>19 going to look back and say, all right, we</p> <p>20 either are successful or we're not; was that</p> <p>21 one of the things that was part of the</p> <p>22 agreement?</p> <p>23 A I don't know.</p> <p>24 MS. TESKE: Object to the form</p> <p>25 of that.</p>

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1 A. COLUCCIO  
 2 **Q Does Golden Spring have any**  
 3 **experience doing research work for clients?**  
 4 MS. TESKE: Object to the  
 5 scope of that question.  
 6 But you can answer, if you  
 7 know.  
 8 A Not that I know of.  
 9 **Q So what investigation did Golden**  
 10 **Spring do of Eastern Profit before deciding**  
 11 **whether it wanted to go forward with this**  
 12 **deal with Eastern Profit?**  
 13 A I don't know.  
 14 **Q Did it conduct any due diligence**  
 15 **of Eastern Profit?**  
 16 A I don't know.  
 17 **Q Did it determine what Eastern**  
 18 **Profit's line of business was?**  
 19 A I don't know.  
 20 **Q Did it determine who controlled**  
 21 **Eastern Profit?**  
 22 MS. TESKE: Objection to the  
 23 form of the question.  
 24 The witness has already  
 25 testified that it had a preexisting

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1 A. COLUCCIO  
 2 controlled Eastern Profit?  
 3 MS. TESKE: Object to the  
 4 scope.  
 5 You can answer, if you know.  
 6 A I was just thinking that if two  
 7 companies have a relationship, they have an  
 8 idea of the officers of each company.  
 9 **Q Do you know that?**  
 10 A No.  
 11 **Q And do you -- you're going to be**  
 12 **told not to answer, but do you actually know**  
 13 **what that relationship is?**  
 14 MS. TESKE: Direct not to  
 15 answer.  
 16 **Q Do you yourself know what the**  
 17 **relationship was?**  
 18 I'm not going to ask what it was.  
 19 I want to know whether this witness even  
 20 knows what the relationship was.  
 21 MS. TESKE: I'm going to  
 22 direct you not answer because she's  
 23 testifying in her corporate capacity  
 24 and her personal knowledge is  
 25 irrelevant.

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1 A. COLUCCIO  
 2 relationship with Eastern Profit.  
 3 But you can answer.  
 4 MR. GREIM: We don't need to  
 5 testify for the witness. Let's just  
 6 see, let's see what Golden Spring  
 7 says.  
 8 **Q Did Golden Spring know who**  
 9 **controlled Eastern Profit?**  
 10 A I think so. I don't know.  
 11 **Q Why do you say you think so?**  
 12 A Because they already had a  
 13 business relationship with Eastern Profit,  
 14 so I would think that they would know.  
 15 **Q I mean was it even a major**  
 16 **business relationship?**  
 17 MS. TESKE: Object to the  
 18 scope.  
 19 You don't have to answer that.  
 20 **Q Was it a contract of some kind?**  
 21 MS. TESKE: You don't have to  
 22 answer that.  
 23 **Q So why do you think that this**  
 24 **prior business relationship was sufficient**  
 25 **for Golden Spring to have known who**

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1 A. COLUCCIO  
 2 **Q Did Yvette Wang just tell you to**  
 3 **say that there was a prior relationship?**  
 4 MS. TESKE: Object to the form  
 5 of the question.  
 6 A She didn't tell me to say it, but  
 7 she told, from my conversation with her, she  
 8 said that there was a preexisting  
 9 relationship.  
 10 **Q And without disclosing what it**  
 11 **was, did she tell you what the relationship**  
 12 **was?**  
 13 A No.  
 14 **Q Did you ask her?**  
 15 A No.  
 16 **Q Now, both Eastern Profit and**  
 17 **Golden Spring New York are controlled by Guo**  
 18 **Wengui; Is that correct?**  
 19 MS. TESKE: Object to the form  
 20 of the question.  
 21 Do not answer it.  
 22 **Q They have common ownership?**  
 23 MS. TESKE: Object to the form  
 24 of the question.  
 25 Do not answer it.

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19 (Pages 70 to 73)

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1 A. COLUCCIO  
 2 **Q Was it an arm's length negotiation**  
 3 **between Yvette Wang and Han Chunguang?**  
 4 MS. TESKE: Object to the --  
 5 I'm sorry.  
 6 Say your question again.  
 7 **Q Was it an arm's length negotiation**  
 8 **between Yvette Wang and Han Chunguang?**  
 9 MS. TESKE: What negotiation?  
 10 MR. GREIM: Over the terms of  
 11 Golden Spring's deal with Eastern  
 12 Profit.  
 13 A I don't understand the question.  
 14 **Q Okay. Have you ever heard of the**  
 15 **term arm's length negotiation, have you ever**  
 16 **heard that before?**  
 17 A No.  
 18 **Q Let me ask you this then -- so you**  
 19 **never heard that -- each side fully controls**  
 20 **its own position and there's no common**  
 21 **control of the two different sides.**  
 22 **So my question is, in this**  
 23 **negotiation about the terms under which**  
 24 **Golden Spring would work for Eastern Profit,**  
 25 **was each side fully in control of its own**

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1 A. COLUCCIO  
 2 A Just all I know was that it was  
 3 Golden Spring could act as limited power of  
 4 attorney for Eastern Profit.  
 5 **Q In what matters?**  
 6 A I don't, I'm not sure.  
 7 **Q Was this in writing?**  
 8 A Yes.  
 9 MR. GREIM: I call for the  
 10 production of this other limited  
 11 power of attorney.  
 12 MS. TESKE: I don't know that  
 13 there is an other limited power of  
 14 attorney.  
 15 MR. GREIM: Well, I've got the  
 16 best they can give me.  
 17 MS. TESKE: And if there is  
 18 and it concerns something other than  
 19 this contract, then it's not  
 20 relevant to this case.  
 21 MR. GREIM: Apparently it  
 22 affected the negotiation between the  
 23 two.  
 24 MS. TESKE: I didn't hear that  
 25 out of her.

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1 A. COLUCCIO  
 2 position in that negotiation?  
 3 MS. TESKE: Object to the  
 4 scope.  
 5 And in so far as she is here  
 6 to testify as to GSNY, not Eastern,  
 7 but you can answer to the best of  
 8 your ability.  
 9 A From what I understand there was,  
 10 there had already been a limited power of  
 11 attorney in place for Golden Spring to act  
 12 as Eastern Profit's limited power of  
 13 attorney.  
 14 So Mr. Han basically told Yvette  
 15 that she could go forward on behalf of  
 16 Eastern Profit because there was that  
 17 limited power of attorney.  
 18 **Q So even before Golden Spring**  
 19 **approached Eastern Profit about the research**  
 20 **agreement, Golden Spring already held a**  
 21 **limited power of attorney on behalf of**  
 22 **Eastern Profit?**  
 23 A Yes.  
 24 **Q Okay. What was the scope of that**  
 25 **authority?**

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1 A. COLUCCIO  
 2 **Q Have you ever seen it?**  
 3 A No.  
 4 **Q Who told you it existed?**  
 5 A Yvette.  
 6 **Q When?**  
 7 A Yesterday.  
 8 **Q Did you ask to see it?**  
 9 A No.  
 10 **Q Well, since GSNY already had this**  
 11 **limited power of attorney, why did they even**  
 12 **go to Mr. Han and ask for**  
 13 **permission for Eastern Profit to enter into**  
 14 **the research agreement?**  
 15 MS. TESKE: Object to the form  
 16 of the question.  
 17 A I don't know.  
 18 **Q So did the limited power of**  
 19 **attorney not already give Golden Spring**  
 20 **authority to just put Eastern Profit's name**  
 21 **on the agreement?**  
 22 MS. TESKE: Object to the form  
 23 of the question.  
 24 A I don't know.  
 25 **Q Who knows the answer?**

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20 (Pages 74 to 77)

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1 A. COLUCCIO  
 2 A I don't know for sure.  
 3 **Q Did Golden Spring come up with a**  
 4 **budget for how much it would cost to work on**  
 5 **this project for Eastern Profit?**  
 6 A I don't know.  
 7 **Q Has Golden Spring been paid for**  
 8 **its work on behalf of Eastern Profit?**  
 9 A No.  
 10 **Q Does Golden Spring New York have**  
 11 **any clients who pay it for work on projects?**  
 12 MS. TESKE: Object.  
 13 Don't answer that.  
 14 **Q Is it typical -- well, let me ask**  
 15 **you this.**  
 16 **How many hours has Golden Spring**  
 17 **put into this Eastern Profit negotiation,**  
 18 **performance, everything that's covered under**  
 19 **its work for Eastern Profit, how many hours**  
 20 **has Golden Spring put into it?**  
 21 A I don't know.  
 22 **Q Hundred hours?**  
 23 A I don't know.  
 24 **Q A thousand?**  
 25 A I don't know.

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1 A. COLUCCIO  
 2 A Right.  
 3 **Q And I suppose you spent sometime**  
 4 **on it too?**  
 5 A On this litigation matter?  
 6 **Q Yes.**  
 7 A In an administrative sense, yes.  
 8 **Q What about the Han Chunguang, does**  
 9 **he spend time on this?**  
 10 A I --  
 11 MS. TESKE: Object to the form  
 12 of the question.  
 13 You can answer.  
 14 A I don't know.  
 15 **Q Is he a Golden Spring employee?**  
 16 A No.  
 17 **Q Does he work in a Golden Spring**  
 18 **office?**  
 19 MS. TESKE: Object to the form  
 20 of the question.  
 21 A No.  
 22 **Q You seem uncertain about that?**  
 23 A I've seen him at the office, but I  
 24 don't think he works out of the office.  
 25 **Q Where does he work?**

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1 A. COLUCCIO  
 2 **Q Who are the different staff at**  
 3 **Golden Spring who work on the Eastern Profit**  
 4 **project?**  
 5 MS. TESKE: Object to the  
 6 form. Asked and answered.  
 7 You can answer.  
 8 A Just Yvette.  
 9 **Q Mr. Podhaskie too though, right?**  
 10 A I'm sorry. The Eastern Profit  
 11 project?  
 12 **Q Yeah. Let's go back.**  
 13 **Is that unclear to you?**  
 14 A Yes.  
 15 **Q Let's go from the negotiation of**  
 16 **the contract through the performance through**  
 17 **everything else that is under the limited**  
 18 **power of attorney.**  
 19 **And so my question is who works on**  
 20 **those things? So far we got Yvette and my**  
 21 **next question is, is that Mr. Podhaskie as**  
 22 **well?**  
 23 A Not that I know of.  
 24 **Q Other than his time spent in this**  
 25 **litigation itself?**

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1 A. COLUCCIO  
 2 A I don't --  
 3 MS. TESKE: Object.  
 4 You don't have to answer that.  
 5 **Q I'm sorry, what were you about to**  
 6 **say?**  
 7 MS. TESKE: I'm directing her  
 8 not to answer. It's way beyond the  
 9 scope.  
 10 **Q Does he have a Golden Spring email**  
 11 **address?**  
 12 A Not that I know of.  
 13 VIDEOGRAPHER: Counselor.  
 14 **Q Why did Eastern Profit tell Golden**  
 15 **Spring it would enter into the contract?**  
 16 A Because, well I know that Mr. Han  
 17 was being persecuted by the CCP and was  
 18 interested in doing research on them, and  
 19 Eastern was in a position to enter into the  
 20 contract.  
 21 **Q What do you mean it was in a**  
 22 **position to be able to enter into the**  
 23 **contract?**  
 24 A It was able to.  
 25 **Q That's literally what Mr. Han told**

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21 (Pages 78 to 81)

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<p>1 A. COLUCCIO  2 Ms. Wang?  3 MS. TESKE: Object to the form  4 of the question.  5 You can answer.  6 A From what I understand.  7 <b>Q Well, does Golden Spring actually  8 know that what Mr. Han said is true, that  9 he's being persecuted by the CCP?</b>  10 MS. TESKE: Object to the form  11 of the question.  12 You can answer.  13 A I don't know.  14 <b>Q Did Golden Spring make any efforts  15 to see whether Mr. Han's story was correct?</b>  16 A I don't know.  17 <b>Q Who would know the answer to that  18 question?</b>  19 A I think maybe Yvette would.  20 <b>Q Did Mr. Han tell Golden Spring  21 what the persecution consisted of?</b>  22 A I don't know.  23 <b>Q Did Mr. Han tell Golden Spring why  24 he thought entering into this research  25 agreement would ease the persecution?</b></p>	<p>1 A. COLUCCIO  2 agreement was successful.  3 <b>Q Okay. My question is a little bit  4 different though.</b>  5 <b>My question is, did Eastern Profit  6 tell Golden Spring how Eastern Profit  7 intended to pay for the research itself?</b>  8 A I don't know.  9 <b>Q Well, did a time come when Golden  10 Spring learned that Eastern Profit couldn't  11 pay anyone anything?</b>  12 MS. TESKE: Object to the form  13 of the question.  14 A I don't know.  15 <b>Q Who knows the answer to that  16 question?</b>  17 A I don't know.  18 <b>Q Is it unusual for Golden Spring to  19 work for free?</b>  20 MS. TESKE: Object to the form  21 of the question.  22 You can answer.  23 A I don't know.  24 <b>Q Did Golden Spring already know  25 that Eastern Profit's assets were frozen at</b></p>
<p style="text-align: center;">Page 82</p>	<p style="text-align: center;">Page 84</p>

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22 (Pages 82 to 85)

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1 A. COLUCCIO  
2 A No. She didn't specifically say  
3 that, but she did say that she didn't report  
4 to anyone.  
5 Q **So you don't know the answer to**  
6 **whether she told other people that Guo**  
7 **Wengui was her boss in negotiating this**  
8 **contract?**  
9 MS. TESKE: Object to the form  
10 of the question, object to the  
11 scope.  
12 We're not here to testify  
13 about Ms. Wang in her personal  
14 capacity. We're here to testify  
15 about GSNY's communications with  
16 Eastern and Guo concerning the  
17 contract.  
18 MR. GREIM: Wait a minute,  
19 wait a second here.  
20 So did Ms. Wang have  
21 discussions with Strategic Vision in  
22 her personal capacity not as a  
23 president of Golden Spring?  
24 MS. TESKE: Your question is  
25 open ended, and I'm saying that you

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A. COLUCCIO

negotiations really got underway. And I'm going to go back a little bit earlier in time before we move on and power through here.

So my question to you is, how did Golden Spring first learn about the research agreement?

A Mr. Guo introduced, Mr. Guo had met with Wallop and Waller and had discussed doing research with them, and then he introduced them to Yvette.

**Q So did he introduce Yvette as president of Golden Spring?**

A Yeah.

**Q He did, okay.**

**Did this occur at a meeting?**

A I'm not sure.

**Q Well, when Mr. Guo introduced -- by the way, do you know the first name of Wallop?**

A French.

**Q And the first name of Waller?**

A Jay Michael.

**Q Did this introduction by Mr. Guo**

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A. COLUCCIO  
of Strategic Vision to Yvette Wang happen in person?

A I don't know.

**Q Do you know when it happened?**

A I don't know.

**Q But it happened, I take it, before Ms. Wang approached Eastern Profit?**

A Correct.

**Q What did Mr. Guo say about Golden Spring to Wallop and Waller?**

A I don't know.

**Q Does Golden Spring know?**

A I don't know.

**Q Who knows the answer to that question?**

A I don't know.

**Q Yvette Wang?**

A I don't know.

**Q Well, you testified that -- well, actually was Yvette Wang present for the introduction?**

MS. TESKE: Object to the form.

You can answer.

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<p>1 A. COLUCCIO  2 A I would think she would have to  3 be.  4 <b>Q Right. So wouldn't you think</b>  5 <b>she'd probably know what Mr. Guo said?</b>  6 MS. TESKE: Objection to the  7 form.  8 You can answer.  9 A I guess so.  10 <b>Q Well, was she translating to</b>  11 <b>Mr. Guo to Wallop and Waller?</b>  12 A I don't know.  13 <b>Q Does Golden Spring know the answer</b>  14 <b>to that question?</b>  15 A I don't know.  16 <b>Q So is Mr. Guo speaking in English</b>  17 <b>at the instruction of Golden Spring to</b>  18 <b>Wallop and Waller?</b>  19 A I don't know.  20 <b>Q Who knows the answer to that?</b>  21 A I don't know.  22 <b>Q Mr. Guo, does Mr. Guo know the</b>  23 <b>answer to it?</b>  24 A I would think so.  25 <b>Q Does Ms. Wang know the answer to</b></p>	<p>1 A. COLUCCIO  2 Vision and Golden Spring and Mr. Guo?  3 A No. I don't think so.  4 <b>Q What all was discussed at this</b>  5 <b>first meeting between Golden Spring, Mr. Guo</b>  6 <b>and Strategic Vision?</b>  7 MS. TESKE: These questions  8 have already been answered, but you  9 can answer them, if you know.  10 A Just, I thought they wanted to do  11 research on the CCP.  12 <b>Q Were any names identified in that</b>  13 <b>first meeting?</b>  14 A I don't know.  15 <b>Q Were the reasons for the research</b>  16 <b>discussed in that first meeting?</b>  17 A I don't know.  18 <b>Q Was the expected timeline</b>  19 <b>discussed in the first meeting?</b>  20 A I don't know.  21 <b>Q Was the relationship between</b>  22 <b>Golden Spring and Mr. Guo discussed in that</b>  23 <b>first meeting?</b>  24 A I don't know.  25 <b>Q And Eastern Profit could not have</b></p>
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24 (Pages 90 to 93)

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<p>1 A. COLUCCIO  2 documents I've just come across the name.  3 <b>Q What's his relationship to Golden</b>  4 <b>Spring?</b>  5 A I don't know.  6 MS. TESKE: Object to the  7 form.  8 <b>Q Do you understand whether Lianchao</b>  9 <b>Han was discussed as the person to sign the</b>  10 <b>research agreement with Strategic Vision?</b>  11 A No.  12 <b>Q Does Golden Spring know the answer</b>  13 <b>to that question?</b>  14 A I don't know.  15 <b>Q Was Golden Spring's existence</b>  16 <b>actually disclosed to Strategic Vision in</b>  17 <b>this introductory meeting?</b>  18 A I believe so.  19 <b>Q Why do you say you believe so?</b>  20 A Because I believe Yvette was  21 introduced as the president of Golden  22 Spring.  23 <b>Q Okay. How do you know that?</b>  24 A From my the conversation with  25 Yvette.</p>	<p>1 A. COLUCCIO  2 march down that too fast.  3 Had Golden Spring done research into  4 the -- well, let me ask you this, how many names  5 were there that Golden Spring gave to Strategic  6 Vision?  7 A I don't know.  8 <b>Q Was it ten?</b>  9 A I don't know.  10 <b>Q Twenty?</b>  11 A I don't know.  12 <b>Q Am I close at all? Do you have</b>  13 <b>some general sense of how many names there</b>  14 <b>were?</b>  15 A No.  16 <b>Q Did Golden Spring do research in</b>  17 <b>with another company into those same names?</b>  18 A I don't know.  19 <b>Q Can you name me anyone one of the</b>  20 <b>names?</b>  21 A No.  22 <b>Q How did Golden Spring come up with</b>  23 <b>the names?</b>  24 MS. TESKE: Object to the  25 form.</p>
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25 (Pages 94 to 97)

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1 A. COLUCCIO  
 2 **Q Yes.**  
 3 A From what I understand, he just  
 4 gave advice on helping to come up with the  
 5 list of names.  
 6 **Q Then my question is, do you have**  
 7 **any other understanding other than that**  
 8 **word, advice, about what Mr. Guo did?**  
 9 MS. TESKE: Object to the form  
 10 of the question.  
 11 A No.  
 12 **Q Do you have authority from Golden**  
 13 **Spring to say anything contrary to what**  
 14 **Yvette Wang told you last night?**  
 15 MS. TESKE: Object to the form  
 16 of the question.  
 17 A Yes.  
 18 **Q So far have you told me anything**  
 19 **contrary to what Ms. Wang told you last**  
 20 **night?**  
 21 MS. TESKE: Object the form of  
 22 the question.  
 23 You can answer?  
 24 A I am not sure.  
 25 **Q Where did Golden Spring obtain**

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1 A. COLUCCIO  
 2 form.  
 3 **Q Did Guo want -- Well, let me ask**  
 4 **you this, so did Guo not give all the names**  
 5 **to Ms. Wang?**  
 6 A From what I understand, that's  
 7 correct. He did not give all the names to  
 8 her.  
 9 **Q Which names did Mr. Guo give to**  
 10 **Ms. Wang?**  
 11 A I don't --  
 12 MS. TESKE: These questions  
 13 have been answered, but you can  
 14 answer, if you know.  
 15 A I don't know.  
 16 **Q What did Mr. Guo tell Ms. Wang**  
 17 **about the names he was giving?**  
 18 A I don't know.  
 19 **Q Who proposed the final set of**  
 20 **names? Was it, were they from Mr. Guo or**  
 21 **from Yvette Wang herself?**  
 22 MS. TESKE: Asked and  
 23 answered, but you can answer.  
 24 A Yvette.  
 25 **Q When I said the final set, you**

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1 A. COLUCCIO  
 2 the -- well, let me ask you this.  
 3 What exactly did Golden Spring  
 4 give to Strategic Vision, what did the work  
 5 product look like?  
 6 MS. TESKE: Object.  
 7 These questions have been  
 8 answered, but you can answer, if you  
 9 know.  
 10 A I don't know other than a list of  
 11 names.  
 12 **Q Was it a list or did it have**  
 13 **attached information for the different**  
 14 **names?**  
 15 A I don't know.  
 16 **Q Do you know other than Mr. Guo who**  
 17 **else worked on compiling the list?**  
 18 A Yvette.  
 19 **Q Other than Yvette and Mr. Guo, who**  
 20 **else worked on compiling the list?**  
 21 A I don't know.  
 22 **Q Where did Yvette go to come up**  
 23 **with the names?**  
 24 A I don't know.  
 25 MS. TESKE: Object to the

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1 A. COLUCCIO  
 2 understand that there were five names added  
 3 to the list at the end?  
 4 MS. TESKE: Object to the  
 5 form.  
 6 **Q Have you heard that before?**  
 7 A No.  
 8 **Q Yvette Wang didn't tell you that**  
 9 **last night?**  
 10 A Correct.  
 11 **Q Can Golden Spring New York tell me**  
 12 **who came up with the last five names on the**  
 13 **list?**  
 14 A I don't know.  
 15 **Q Did Mr. Guo tell Golden Spring**  
 16 **what his views were on the last five names**  
 17 **added to the list?**  
 18 A I don't know.  
 19 **Q What did Guo and Golden Spring**  
 20 **tell Strategic Vision about what they intend**  
 21 **to do with with the research results?**  
 22 A I don't know.  
 23 **Q Did you discuss this with Ms. Wang**  
 24 **last night?**  
 25 A No.

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26 (Pages 98 to 101)

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Didn't they tell Strategic Vision</b></p> <p>3 <b>that intended to publicize the research</b></p> <p>4 <b>results at the appropriate time?</b></p> <p>5 MS. TESKE: Objection to the</p> <p>6 form.</p> <p>7 These questions have been</p> <p>8 answered, but you can answer, if you</p> <p>9 know.</p> <p>10 A I don't know.</p> <p>11 <b>Q Did they disclose to Strategic</b></p> <p>12 <b>Vision how they intended to publicize the</b></p> <p>13 <b>results?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Did they tell Strategic Vision</b></p> <p>16 <b>that they intended to use Mr. Guo's own</b></p> <p>17 <b>media entity to publicize the research</b></p> <p>18 <b>results?</b></p> <p>19 MS. TESKE: Object to the</p> <p>20 form.</p> <p>21 If you could, answer.</p> <p>22 A I don't know.</p> <p>23 <b>Q Why don't you, if you could take a</b></p> <p>24 <b>look at topic three on the list.</b></p> <p>25 <b>Do you see that?</b></p>	<p>1 A. COLUCCIO</p> <p>2 topic three?</p> <p>3 MS. TESKE: Objection to the</p> <p>4 form of the question.</p> <p>5 You can answer, if anything is</p> <p>6 popping out to you.</p> <p>7 A Not anything I can think of they</p> <p>8 haven't already said.</p> <p>9 <b>Q Did Golden Spring explore any</b></p> <p>10 <b>other candidates for entering into this</b></p> <p>11 <b>research agreement other than Eastern</b></p> <p>12 <b>Profit?</b></p> <p>13 A I don't know.</p> <p>14 <b>Q What did Golden Spring tell</b></p> <p>15 <b>Strategic Vision about how the research</b></p> <p>16 <b>results would be disseminated?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q In other words, did -- let me ask</b></p> <p>19 <b>you this. Did Golden Spring have any deal</b></p> <p>20 <b>with Guo Wengui or Eastern Profit about who</b></p> <p>21 <b>would be able to see the research results?</b></p> <p>22 MS. TESKE: Object to the form</p> <p>23 of the question.</p> <p>24 You can answer.</p> <p>25 A I don't know.</p>
<p>Page 102</p> <p>1 A. COLUCCIO</p> <p>2 A Um-hmm.</p> <p>3 <b>Q Golden Spring dealings with</b></p> <p>4 <b>Eastern Profit and the Guo Wengui between</b></p> <p>5 <b>January 1, 2017, and July 1, 2019, as those</b></p> <p>6 <b>dealings relate to the negotiation,</b></p> <p>7 <b>execution or performance of the contract at</b></p> <p>8 <b>issue.</b></p> <p>9 <b>Do you see that?</b></p> <p>10 A Um-hmm.</p> <p>11 <b>Q Why don't you just tell me what</b></p> <p>12 <b>you know about topic three. What did Yvette</b></p> <p>13 <b>Wang tell you last night that relates to</b></p> <p>14 <b>topic three?</b></p> <p>15 MS. TESKE: Object to the</p> <p>16 form, but you can answer.</p> <p>17 A So I know that Mr. Guo, as I said,</p> <p>18 gave advice regarding the list of names.</p> <p>19 And he also gave advice regarding the terms</p> <p>20 of the research agreement and then dealings</p> <p>21 with Eastern Profit. Like I said, she had a</p> <p>22 discussion with Mr. Han, and Mr. Han said</p> <p>23 Eastern Profit could enter into the</p> <p>24 contract.</p> <p>25 <b>Q Do you know anything else about</b></p>	<p>Page 104</p> <p>1 A. COLUCCIO</p> <p>2 <b>Q Did Golden Spring have any deal</b></p> <p>3 <b>with Eastern Profit or Guo Wengui that a</b></p> <p>4 <b>company called ACA would be able to have the</b></p> <p>5 <b>research results?</b></p> <p>6 MS. TESKE: Object to the form</p> <p>7 of the question.</p> <p>8 You can answer.</p> <p>9 A I don't know.</p> <p>10 <b>Q Did Golden Spring Eastern Profit</b></p> <p>11 <b>and Mr. Wengui have any deal regarding who</b></p> <p>12 <b>would decide how the research results would</b></p> <p>13 <b>be used or disseminated?</b></p> <p>14 MS. TESKE: Object to the form</p> <p>15 of the question.</p> <p>16 You can answer.</p> <p>17 A I don't know.</p> <p>18 <b>Q Who knows the answer to that</b></p> <p>19 <b>question?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q What did Mr. Guo advise Golden</b></p> <p>22 <b>Spring regarding the terms of the research</b></p> <p>23 <b>agreement?</b></p> <p>24 A I believe he gave advice on the</p> <p>financial terms in the agreement.</p>

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27 (Pages 102 to 105)

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<p>1 A. COLUCCIO</p> <p>2 <b>Q What was his advice?</b></p> <p>3 A I don't know.</p> <p>4 <b>Q What were the financial terms of</b></p> <p>5 <b>the agreement?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q So Guo knew of the finances of</b></p> <p>8 <b>Eastern Profit?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question.</p> <p>11 How is she supposed to opine</p> <p>12 on that? That's not what she's here</p> <p>13 to testify on. She's here to</p> <p>14 testify to Golden Spring's</p> <p>15 knowledge, not Mr. Guo's knowledge.</p> <p>16 <b>Q When Mr. Guo was advising Eastern</b></p> <p>17 <b>Profit on the financial terms of the</b></p> <p>18 <b>research agreement, didn't he know what</b></p> <p>19 <b>Eastern Profit's own finances were?</b></p> <p>20 MS. TESKE: Same objection.</p> <p>21 <b>Q Did he disclose them?</b></p> <p>22 MS. TESKE: Do you have a</p> <p>23 question about GSNY?</p> <p>24 <b>Q Oh, I did say Eastern Profit. I</b></p> <p>25 <b>keep forgetting we have to keep them</b></p>	<p>1 A. COLUCCIO</p> <p>2 A I don't know.</p> <p>3 <b>Q Did you ask any of these questions</b></p> <p>4 <b>of Yvette Wang last night?</b></p> <p>5 A No.</p> <p>6 <b>Q Did she volunteer any of this to</b></p> <p>7 <b>you?</b></p> <p>8 A No.</p> <p>9 <b>Q Did Golden Spring give advice to</b></p> <p>10 <b>Eastern Profit on the terms of the research</b></p> <p>11 <b>agreement?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Well, let me ask you this, you</b></p> <p>14 <b>already testified that there was this</b></p> <p>15 <b>meeting between Golden Spring and between</b></p> <p>16 <b>Yvette Wang, right, acting on behalf of</b></p> <p>17 <b>Golden Spring, correct?</b></p> <p>18 A Correct.</p> <p>19 <b>Q And Mr. Han Chunguang, right?</b></p> <p>20 A Correct.</p> <p>21 <b>Q In that meeting she disclosed the</b></p> <p>22 <b>research agreement, right?</b></p> <p>23 A Correct.</p> <p>24 <b>Q Let's do this right. Strike that.</b></p> <p>25 <b>In that meeting she disclosed that</b></p>
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1 A. COLUCCIO  
 2 **Q Well, I'm asking you whether**  
 3 **Golden Spring knows. Does Golden Spring**  
 4 **know whether it asked Mr. Han Chunguang**  
 5 **after that first discussion for authority to**  
 6 **sign the research agreement?**  
 7 MS. TESKE: Object to the  
 8 form.  
 9 You can answer.  
 10 A I don't know.  
 11 **Q Well, how about this, do you**  
 12 **handle reports from Golden Spring to Eastern**  
 13 **Profit about the contract?**  
 14 A No.  
 15 **Q How about the litigation?**  
 16 A No.  
 17 **Q You ever seen any?**  
 18 A Any reports?  
 19 **Q Um-hmm. From Golden Spring to**  
 20 **Eastern Profit about the contract.**  
 21 A No.  
 22 **Q Have you ever seen any email from**  
 23 **Golden Spring to Eastern Profit about the**  
 24 **research agreement at issue here?**  
 25 A No.

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1 A. COLUCCIO  
 2 A I don't know.  
 3 **Q I'm going to hand you what we're**  
 4 **marking as Golden Spring two. Take a look**  
 5 **at this if you could please.**  
 6 **Whereupon, Limited Power of**  
 7 **Attorney was marked as**  
 8 **Plaintiff's Exhibit 2 for**  
 9 **identification as of this date.)**  
 10 **Q Take a look at this if you could**  
 11 **please. You see it's a two page document.**  
 12 **Top says limited power of attorney. Bates**  
 13 **number, Eastern 276 to 277.**  
 14 **Have you seen this before?**  
 15 A No.  
 16 **Q You don't recognize this document?**  
 17 A I haven't seen it.  
 18 **Q Did Golden Spring negotiate this**  
 19 **with Eastern Profit?**  
 20 A I don't know.  
 21 **Q You see the person who notarized**  
 22 **it on the bottom of page two?**  
 23 A Yes.  
 24 **Q What name do you see there?**  
 25 A Karin Maistrello.

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1 A. COLUCCIO  
 2 **Q What about any email from Golden**  
 3 **Spring to Eastern Profit reporting on the**  
 4 **litigation?**  
 5 A No.  
 6 **Q Does Yvette Wang have the**  
 7 **authority to sign Han Chunguang's name on**  
 8 **documents for Eastern Profit?**  
 9 MS. TESKE: Object to the form  
 10 of the question.  
 11 A I don't know.  
 12 **Q Is that within the scope of the**  
 13 **limited power of attorney that Eastern**  
 14 **Profit has granted to Golden Spring in this**  
 15 **case?**  
 16 MS. TESKE: Object to the form  
 17 of the question.  
 18 A I don't know.  
 19 **Q At what point does Mr. Chunguang**  
 20 **have to approve decisions that Golden Spring**  
 21 **makes regarding the contract?**  
 22 A I don't know.  
 23 **Q At what point does Han Chunguang**  
 24 **have to approve decisions that Golden Spring**  
 25 **makes regarding litigation?**

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1 A. COLUCCIO  
 2 **Q Is she a Golden Spring employee?**  
 3 A Yes.  
 4 **Q You see who signed it up above**  
 5 **Chunguang Han?**  
 6 A Yes.  
 7 **Q We already established he's not a**  
 8 **Golden Spring employee, but you know who he**  
 9 **is?**  
 10 A Yes.  
 11 **Q Do you know who filled in as title**  
 12 **as director?**  
 13 A No.  
 14 **Q Have you talked to Karin**  
 15 **Maistrello about the case?**  
 16 A No.  
 17 **Q So I guess just to be clear, this**  
 18 **limited power of attorney was not shown to**  
 19 **you in your meeting last night?**  
 20 A Correct.  
 21 **Q Do you have any understanding**  
 22 **about what the limited power of attorney**  
 23 **covers?**  
 24 A No.  
 25 **Q Do you know whether the limited**

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29 (Pages 110 to 113)

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1 A. COLUCCIO  
 2 power of attorney that you testified about  
 3 earlier is broader or narrower in scope than  
 4 this limited power of attorney?  
 5 Why don't you take a second and  
 6 look at the operative portions. You'll see  
 7 it starts in the middle. "This appointment  
 8 shall apply only to the following enumerated  
 9 transactions and nothing herein or in the  
 10 agreement shall be construed to the  
 11 contrary."  
 12 And first of all, you'll see it  
 13 says, an appointment, then it mentions an  
 14 agreement. Are you aware of any other  
 15 agreement?  
 16 A No.  
 17 Q Well, do you know whether a lawyer  
 18 even drafted this?  
 19 A I don't know who drafted this.  
 20 Q Well, let's look at the power of  
 21 attorney here. Number one, negotiating a  
 22 contract between Eastern and SV.  
 23 Do you see that there?  
 24 A Um-hmm.  
 25 Q Second, executing a contract

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1 A. COLUCCIO  
 2 A Yes.  
 3 Q Now, that was before the  
 4 negotiation or the agreement began; is that  
 5 right?  
 6 A From what I understand, yes.  
 7 Q And if you see this was signed, it  
 8 purports to be signed the 30th day of  
 9 August, 2018, right?  
 10 A Right.  
 11 Q Do you know why this was not  
 12 signed until August 30th of 2018?  
 13 A I don't know why.  
 14 Q And by the way, has Golden Spring  
 15 been given a power of attorney like this for  
 16 any other client of its?  
 17 MS. TESKE: Objection.  
 18 You don't have to answer that  
 19 question.  
 20 Q Have you ever seen a power of  
 21 attorney like this before?  
 22 A Have I ever seen one?  
 23 Q Um-hmm.  
 24 A Yes.  
 25 Q In similar format to this?

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1 A. COLUCCIO  
 2 between Eastern and SV, right?  
 3 A Um-hmm.  
 4 Q And then third the full and  
 5 present preservation of Eastern's rights  
 6 under any contract between Eastern and SV,  
 7 including but not limited to, prosecuting  
 8 and/or defending any and all claims  
 9 concerning the relationship between Eastern  
 10 and SV; including, but not limited to, any  
 11 and all of the following acts. And it's got  
 12 three things there.  
 13 Do you see that?  
 14 A Yes.  
 15 Q A is retaining counsel; B is  
 16 executing affidavits and pleadings on behalf  
 17 of Eastern; and C is resolving and/or  
 18 resettling any dispute between Eastern and  
 19 SV via execution of the settlement  
 20 agreement.  
 21 Do you see all those things?  
 22 A Yes.  
 23 Q Go to the next paragraph it goes  
 24 on and do you see where it says this is  
 25 effective as of October 1, 2017, right?

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1 A. COLUCCIO  
 2 MS. TESKE: Object to the  
 3 form.  
 4 You can answer.  
 5 A I haven't thoroughly read through  
 6 others that I've seen.  
 7 Q Well, we just went through the  
 8 terms and my question to you is, is this  
 9 broader or narrower than the power of  
 10 attorney you testified about earlier that  
 11 Golden Spring already had on behalf of  
 12 Eastern before Yvette Wang went to talk to  
 13 Han Chunguang?  
 14 MS. TESKE: Object to the  
 15 form, but you can answer.  
 16 A This is the one that I was  
 17 referring to.  
 18 Q I see.  
 19 A From what I understand since it  
 20 was in effect starting in October of 2017.  
 21 Q Right. But in October no one knew  
 22 that this power of attorney was going to be  
 23 executed, did they?  
 24 A I don't know.  
 25 Q So do you think there was a prior

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30 (Pages 114 to 117)

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1 A. COLUCCIO  
 2 version of this from October?  
 3 A Not that I know of.  
 4 **Q So do you know whether Eastern --**  
 5 **do you know whether a power of attorney**  
 6 **actually existed in October 2017 between**  
 7 **Strategic Vision and Eastern Profit?**  
 8 A Other than this?  
 9 **Q Other than this.**  
 10 A Not that I know of.  
 11 **Q So did Golden Spring back in**  
 12 **October of 2017 know that it already had a**  
 13 **power of attorney for Eastern Profit?**  
 14 MS. TESKE: Object to the  
 15 form.  
 16 You can answer.  
 17 A From what I understood, yes.  
 18 **Q So how did they know? How did**  
 19 **Golden Spring know it had a power of**  
 20 **attorney back in October --**  
 21 A I don't know.  
 22 **Q -- of 2017?**  
 23 A I don't know.  
 24 **Q Well, who told you that Golden**  
 25 **Spring understood this?**

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1 A. COLUCCIO  
 2 remember it was executed in August, right?  
 3 A Um-hmm.  
 4 **Q My question to you is about what**  
 5 **Golden Spring understood back in October or**  
 6 **back in the period before the first**  
 7 **approach.**  
 8 A Yeah.  
 9 **Q Did Golden Spring understand that**  
 10 **it was operating under a power of attorney**  
 11 **that's as broad as this one or was it one**  
 12 **that was narrower than this?**  
 13 MS. TESKE: Object to the  
 14 form.  
 15 You can answer.  
 16 A I don't know.  
 17 **Q Who was running the day-to-day**  
 18 **operations of Eastern Profit during the time**  
 19 **before the approach between Yvette Wang and**  
 20 **Han Chunguang?**  
 21 MS. TESKE: Object to the  
 22 scope of the question.  
 23 If you know, you can answer?  
 24 A I don't know.  
 25 **Q Did Golden Spring when it**

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1 A. COLUCCIO  
 2 A Yvette.  
 3 **Q So Yvette told you last night that**  
 4 **in October of 2017, Golden Spring already**  
 5 **believed it had a power of attorney for**  
 6 **Eastern Profit?**  
 7 A I don't think she gave me a  
 8 specific month. She just said it existed  
 9 before she had the initial conversation with  
 10 Mr. Han.  
 11 **Q Okay. So during that period**  
 12 **before she had the initial conversation with**  
 13 **Mr. Han, was the power of attorney that**  
 14 **Eastern Profit, I'm sorry, that Golden**  
 15 **Spring was operating under at that time**  
 16 **broader or narrower than this later written**  
 17 **power of attorney?**  
 18 MS. TESKE: Object to the  
 19 form. Asked and answered.  
 20 **Q You can answer. She just**  
 21 **objected.**  
 22 A So from what I understand this is  
 23 the power of attorney that I had been  
 24 referring to.  
 25 **Q I understand. I understand, but**

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1 A. COLUCCIO  
 2 approached Han Chunguang know what Eastern  
 3 Profit did?  
 4 A I don't know.  
 5 **Q Did Golden Spring know Eastern**  
 6 **Profit's line of business?**  
 7 A I don't know.  
 8 **Q Did Golden Spring know whether**  
 9 **Eastern Profit was credit worthy?**  
 10 A I don't know.  
 11 **Q Let talk about Guo Wengui.**  
 12 **Have you seen him before by the**  
 13 **way?**  
 14 A Yes.  
 15 **Q You'd recognize him if you saw him**  
 16 **in person?**  
 17 A Yes.  
 18 **Q Now we talked about Golden**  
 19 **Spring's agency, for lack of a better term,**  
 20 **for Eastern Profit.**  
 21 **My question now is, what did**  
 22 **Golden Spring understand Guo Wengui's**  
 23 **relationship to be with Eastern Profit.**  
 24 MS. TESKE: Object to the  
 25 form.

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1 A. COLUCCIO  
2 You can answer?  
3 A I don't know.  
4 **Q What did Golden Spring understand**  
5 **Guo's relationship to be with Golden Spring?**  
6 A That he's a client of Golden  
7 Spring.  
8 **Q Is he also part owner of Golden**  
9 **Spring?**  
10 A No. Not that I know of.  
11 **Q Who owns Golden Spring?**  
12 A I don't know. I know Yvette's the  
13 president, and I don't know who the owner  
14 is.  
15 **Q Well, who's the sole director of**  
16 **Golden Spring?**  
17 A I know Guo Qiang is a director.  
18 **Q And who owns all the shares of**  
19 **Golden Spring New York?**  
20 A I don't know.  
21 **Q Golden Spring Hong Kong, isn't it?**  
22 MS. TESKE: Object to the  
23 form.  
24 You can answer.  
25 THE WITNESS: Okay.

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1 A. COLUCCIO  
2 A Yeah, I'm sorry. China Golden  
3 Spring owns Golden Spring New York.  
4 Q **By the way, do you get paid by**  
5 **Golden Spring New York?**  
6 A Yes.  
7 Q **Does anybody else pay you for your**  
8 **work?**  
9 MS. TESKE: Object to the  
10 form.  
11 A No.  
12 Q **Who owns Golden Spring Hong Kong?**  
13 A I don't know.  
14 Q **Do you know what line of work it's**  
15 **in?**  
16 A No.  
17 Q **Do you know what line of work**  
18 **Golden Spring New York is in?**  
19 A Yes.  
20 Q **What does it do?**  
21 A So it provides professional  
22 services within the US to multiple clients.  
23 Q **What do you mean by professional**  
24 **services, what is that?**  
25 A We just assist on various projects

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A. COLUCCIO  
that our clients need help with.

**Q Why do you call them professional?**  
A I don't know.

**Q Well, is that what Yvette Wang told you to say last night, professional services?**  
MS. TESKE: Object to the form of the question.  
I think it's an offensive and inappropriate question.  
A I don't know if she used those specific words.

**Q What did she tell you to say that Golden Spring does?**  
MS. TESKE: Object to the form of the question. I find it to be offensive and an inappropriate question.  
You can answer.  
A She didn't specifically tell me to say anything, but our conversation was from what I understood is that we offer services to clients within the US.

**Q What kind of services?**

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A. COLUCCIO

A I think that would be confidential between us and our clients.

**Q You don't have to tell me who the clients are. What category? Legal services? Accounting?**

A Yes.

**Q Okay. So the answer is yes to legal services?**

A To both. Yes.

**Q You said yes to accounting as well?**

A Yes.

**Q So is Golden Spring New York a law firm?**

A No.

MS. TESKE: Objection to the form of the question.

**Q It provides the services of its attorneys to clients?**

A I'm sorry. I don't understand the question.

**Q Well, what -- legal services can mean being a lawyer for somebody. Okay. It might involve filings. So I'm going, again**

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<p>1 A. COLUCCIO</p> <p>2 I don't want you to go through individual</p> <p>3 cases. We're not going to spend our time on</p> <p>4 that today here.</p> <p>5 But what do you mean by legal</p> <p>6 services?</p> <p>7 MS. TESKE: Objection.</p> <p>8 <b>Q Just providing counsel in the</b></p> <p>9 <b>litigation or advising, giving legal advice?</b></p> <p>10 MS. TESKE: Object to the form</p> <p>11 of the question. I think the</p> <p>12 specifics are beyond the scope of</p> <p>13 the order?</p> <p>14 MR. GREIM: Yeah. That's why</p> <p>15 we're not going to go into the</p> <p>16 specifics.</p> <p>17 MS. TESKE: You are going into</p> <p>18 the specifics. You can answer, if</p> <p>19 you understand more specifically.</p> <p>20 A I don't understand more</p> <p>21 specifically.</p> <p>22 <b>Q You are a paralegal for this</b></p> <p>23 <b>entity, right?</b></p> <p>24 A Um-hmm.</p> <p>25 <b>Q Do you work in any non-litigation</b></p>	<p>1 A. COLUCCIO</p> <p>2 Spring provide any services to clients</p> <p>3 abroad outside the US?</p> <p>4 MS. TESKE: Objection to the</p> <p>5 form.</p> <p>6 A I think so.</p> <p>7 <b>Q In China?</b></p> <p>8 MS. TESKE: Object to the</p> <p>9 form.</p> <p>10 A I don't -- no, I don't think so.</p> <p>11 <b>Q Hong Kong?</b></p> <p>12 MS. TESKE: Object to the</p> <p>13 form.</p> <p>14 You can answer.</p> <p>15 A I'm not sure. Well, Eastern</p> <p>16 Profit is a Hong Kong company, so.</p> <p>17 <b>Q Well, that's true, that's a good</b></p> <p>18 <b>point. And does it provide services to some</b></p> <p>19 <b>British Virgin Island companies?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 A I'm not sure.</p> <p>23 <b>Q Is ACA a client of Golden Spring?</b></p> <p>24 MS. TESKE: Object.</p> <p>25 And don't answer.</p>
<p>Page 126</p> <p>1 A. COLUCCIO</p> <p>2 matters?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 A Yes.</p> <p>6 <b>Q Okay. Do you know of any client</b></p> <p>7 <b>at Golden Spring New York not related to Guo</b></p> <p>8 <b>Wengui?</b></p> <p>9 MS. TESKE: Object to the</p> <p>10 form.</p> <p>11 A I don't know.</p> <p>12 <b>Q We've got legal services, you've</b></p> <p>13 <b>got accounting services. What other</b></p> <p>14 <b>professional services does Golden Spring New</b></p> <p>15 <b>York render to clients in the US?</b></p> <p>16 A That's all I know of.</p> <p>17 <b>Q So are all the, is every single</b></p> <p>18 <b>one of the employees at Golden Spring New</b></p> <p>19 <b>York involved in either legal services or</b></p> <p>20 <b>accounting services?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 form.</p> <p>23 A We also have IT to assist with the</p> <p>24 rest of us.</p> <p>25 <b>Q Okay. All right. Does Golden</b></p>	<p>Page 128</p> <p>1 A. COLUCCIO</p> <p>2 <b>Q Do you know the answer to the</b></p> <p>3 <b>question?</b></p> <p>4 MS. TESKE: Object.</p> <p>5 MR. GREIM: You don't have to</p> <p>6 tell me what the answer is. I only</p> <p>7 want to know whether the witness</p> <p>8 knows the answer to the question.</p> <p>9 MS. TESKE: Object.</p> <p>10 And tell the witness not the</p> <p>11 answer.</p> <p>12 MR. GREIM: I'm going to go</p> <p>13 ahead and mark an exhibit.</p> <p>14 (Whereupon, Declaration was</p> <p>15 marked as Golden Spring Exhibit</p> <p>16 3 for identification as of this</p> <p>17 date.)</p> <p>18 <b>Q How does Golden Spring New York</b></p> <p>19 <b>market itself as having business contacts</b></p> <p>20 <b>and expertise in China?</b></p> <p>21 MS. TESKE: Object to the form</p> <p>22 of the question.</p> <p>23 A I don't know.</p> <p>24 <b>Q How about Golden Spring Hong Kong,</b></p> <p>25 <b>its parent company, does it market itself as</b></p>

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1 A. COLUCCIO  
2 having business expertise and contacts in  
3 China?  
4 MS. TESKE: Object to the  
5 scope. The witness is not here to  
6 talk about Golden Spring Hong Kong  
7 or China Golden Spring. She's here  
8 to talk about Golden Spring New  
9 York.  
10 **Q I'm going to show you what we're**  
11 **marking as Exhibit Three. If you could look**  
12 **at paragraph two, please.**  
13 A Okay.  
14 **Q You'll see this a declaration of**  
15 **Guo Wengui that he made out just a few**  
16 **months ago. And he says, China Golden**  
17 **Spring Group, Hong Kong Limited, China**  
18 **Golden Spring, a Hong Kong company owned and**  
19 **operated by my family, entered into a**  
20 **consulting agreement with ACA investment**  
21 **management limited, ACA, in January 2017. A**  
22 **consulting agreement.**  
23 **Now, it's true, is it not, that**  
24 **Golden Spring New York's parent company is**  
25 **owned and operated by Guo family, isn't it?**

1 A. COLUCCIO  
2 **Q What do you mean by client?**  
3 A That Golden Spring New York  
4 provides services to him.  
5 **Q For free or for pay?**  
6 A I don't know.  
7 MS. TESKE: Object to the  
8 form.  
9 If you know.  
10 **Q Does Guo Wengui provide services**  
11 **to Golden Spring New York?**  
12 MS. TESKE: Object. Beyond  
13 the scope.  
14 You don't need to answer that.  
15 MR. GREIM: Well I'm afraid it  
16 is. Let's just take away any --  
17 **Q Does he provide services to Golden**  
18 **Spring New York with respect to the contract**  
19 **at issue here?**  
20 MS. TESKE: Object to the  
21 form.  
22 You can answer.  
23 A The only thing I know that he had  
24 input on was initially when the contract was  
25 first being worked out when he gave help

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1 A. COLUCCIO  
2 MS. TESKE: Objection to the  
3 form.  
4 And direct the witness not to  
5 answer.  
6 **Q You're going to take your**  
7 **counsel's suggestion there?**  
8 A Yes.  
9 **Q Does Guo Wengui receive**  
10 **partnership draws from Golden Spring?**  
11 A I don't know.  
12 **Q Does he receive distributions from**  
13 **Golden Spring?**  
14 MS. TESKE: Asked and  
15 answered. Asked and answered.  
16 A I don't know.  
17 **Q What is Guo Wengui's relationship**  
18 **to Golden Spring, Golden Spring New York?**  
19 MS. TESKE: Asked and  
20 answered.  
21 A He's a client of Golden Spring New  
22 York.  
23 **Q So does he pay Golden Spring New**  
24 **York for services?**  
25 A I don't know.

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1 A. COLUCCIO  
 2 Spring won't tell us today whether Guo  
 3 Wengui negotiated on behalf of Eastern  
 4 Profit?  
 5 MS. TESKE: Objection to the  
 6 form. That is not within the scope  
 7 allowable by the Court and I've  
 8 directed the witness not to answer.  
 9 **Q Did Guo Wengui negotiate on behalf**  
 10 **of Golden Spring with Strategic Vision?**  
 11 MS. TESKE: Object to the  
 12 form.  
 13 You can answer.  
 14 A No.  
 15 **Q How do you know that?**  
 16 A From what I understand when he  
 17 initially met with Wallop and Waller he was  
 18 doing so on his own. Not on behalf of  
 19 Golden Spring.  
 20 **Q Okay. Now, where have you heard**  
 21 **that?**  
 22 MS. TESKE: Object to the  
 23 form.  
 24 You can answer.  
 25 A In my conversation with Yvette.

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1 A. COLUCCIO  
 2 MS. TESKE: Asked and  
 3 answered.  
 4 A Because I know he's a client of  
 5 Golden Spring.  
 6 **Q Could he -- why does that mean he**  
 7 **can't control it as well?**  
 8 MS. TESKE: Object to the  
 9 form. Argumentative?  
 10 A I just know that's his  
 11 relationship with Golden Spring. He is a  
 12 client of Golden Spring and nothing else.  
 13 **Q Okay. And who told you that?**  
 14 A Well, I've known that since I  
 15 started working at Golden Spring.  
 16 **Q I see. Okay. So what things have**  
 17 **you seen that indicate to you that Guo**  
 18 **Wengui is a client of Golden Spring,**  
 19 **exclusively a client of Golden Spring?**  
 20 MS. TESKE: Object to the  
 21 form.  
 22 You can answer, if you know.  
 23 A I haven't necessarily seen things.  
 24 It just in my conversations with other  
 25 people at Golden Spring.

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1 A. COLUCCIO  
 2 **Q Is that in your notes?**  
 3 MS. TESKE: Object to the form  
 4 of the question.  
 5 You can answer, if you know.  
 6 A I don't think so.  
 7 **Q Did there come a time when Guo**  
 8 **Wengui began to negotiate on behalf of**  
 9 **Golden Spring?**  
 10 MS. TESKE: Asked and  
 11 answered.  
 12 You can answer.  
 13 A I don't know. I don't, I don't  
 14 know.  
 15 **Q Who at Golden Spring knows the**  
 16 **answer to that question?**  
 17 A I don't know.  
 18 **Q Does Guo Wengui control Golden**  
 19 **Spring?**  
 20 MS. TESKE: Asked and  
 21 answered.  
 22 A No.  
 23 **Q Do you know that?**  
 24 A Yes.  
 25 **Q How?**

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1 A. COLUCCIO  
 2 **Q So has Guo Wengui told you that he**  
 3 **is a client and not an owner of Golden**  
 4 **Spring?**  
 5 MS. TESKE: Object to the  
 6 scope of the question. You can  
 7 answer.  
 8 A No.  
 9 **Q So what other people have told you**  
 10 **things that make you believe that Guo Wengui**  
 11 **is exclusively a client and not an owner of**  
 12 **Golden Spring?**  
 13 MS. TESKE: Object to the  
 14 scope.  
 15 But you can answer if you  
 16 remember.  
 17 A I can remember Yvette telling me  
 18 that he's a client of Golden Spring.  
 19 **Q In what matter? I guess let me**  
 20 **ask you this, what things is Golden Spring**  
 21 **doing for Mr. Guo Wengui?**  
 22 MS. TESKE: Object.  
 23 And direct the witness not to  
 24 answer.  
 25 **Q So all we can get from you is**

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35 (Pages 134 to 137)

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1 A. COLUCCIO  
 2 Yvette says he's a client.  
 3 Have you worked on anything where it's  
 4 been apparent to you that Guo Wengui is a client of  
 5 Golden Spring?  
 6 MS. TESKE: Object to the  
 7 scope of the question.  
 8 But you can answer.  
 9 A Yes.  
 10 Q **What was that?**  
 11 MS. TESKE: Object.  
 12 And direct the witness not to  
 13 answer.  
 14 Q **What's your understanding of what**  
 15 **it means for someone to be a client of**  
 16 **Golden Spring?**  
 17 A That Golden Spring provides  
 18 services to them.  
 19 Q **And is that inconsistent with the**  
 20 **recipient of the services also being an**  
 21 **owner of Golden Spring?**  
 22 A I'm sorry. Could you repeat that.  
 23 Q **Sure. Is Golden Spring's**  
 24 **provision of services for someone**  
 25 **inconsistent with that person also owning**

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1 A. COLUCCIO  
 2 he's a client of Golden Spring.  
 3 MR. GREIM: Just so we're  
 4 clear every now and then Ms. Teske  
 5 we're not going to allow that, just  
 6 for the record that means you're  
 7 instructing the witness not answer,  
 8 correct?  
 9 MS. TESKE: I'm saying that  
 10 it's outside of the scope of the  
 11 order, and I am directing the  
 12 witness not to answer.  
 13 MR. GREIM: Okay. Very good.  
 14 Q **Now, when Mr. Guo provided advice**  
 15 **to Golden Spring New York on this contract,**  
 16 **was he doing that as a client of Golden**  
 17 **Spring New York. Or was he doing it as an**  
 18 **adviser to Golden Spring New York?**  
 19 MS. TESKE: Object to the form  
 20 of the question.  
 21 A I don't know.  
 22 Q **Does Golden Spring New York know?**  
 23 A I don't know.  
 24 Q **Is there any written agreement**  
 25 **between Guo Wengui and Golden Spring New**

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1 A. COLUCCIO  
 2 Golden Spring?  
 3 MS. TESKE: Object to the  
 4 form.  
 5 You can answer?  
 6 A I don't know.  
 7 Q **The two things could both be true,**  
 8 **couldn't they?**  
 9 MS. TESKE: Object to the  
 10 form.  
 11 You can answer.  
 12 A I don't know.  
 13 Q **So no one has ever told you that**  
 14 **Guo Wengui is not an owner of Golden Spring**  
 15 **New York, have they?**  
 16 MS. TESKE: Object to the  
 17 form.  
 18 You can answer.  
 19 A Is not an owner. I don't remember  
 20 if anyone specifically said those words to  
 21 me. I don't remember.  
 22 Q **Rather what they've told you is**  
 23 **Guo Wengui is a client of Golden Spring,**  
 24 **correct?**  
 25 A Right. I. have been told that

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1 A. COLUCCIO  
 2 York?  
 3 A I don't know.  
 4 Q **Is there any writing of any kind**  
 5 **explaining what Guo Wengui was supposed to**  
 6 **be doing with respect to the research**  
 7 **agreement?**  
 8 A I don't know.  
 9 Q **So you've testified that Golden**  
 10 **Spring New York was working under this power**  
 11 **of attorney for Eastern Profit.**  
 12 And so my question to you is was  
 13 Guo Wengui working alongside of Golden  
 14 Spring as yet another agent for Eastern  
 15 Profit, or was Guo working on the research  
 16 agreement as an agent of Golden Spring?  
 17 MS. TESKE: I'm sorry, can you  
 18 read that back to me.  
 19 Q **Does the witness understand the**  
 20 **question?**  
 21 MS. TESKE: But I need to  
 22 understand it in order to know if I  
 23 am objecting to it.  
 24 (Whereupon, the requested  
 25 testimony was read by the court

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36 (Pages 138 to 141)

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<p>1 A. COLUCCIO 2 reporter.) 3 MS. TESKE: Object to the form 4 of the question. 5 Again the witness is not here 6 to testify as in what capacity Guo 7 Wengui was working except to the 8 extent that it was on behalf of 9 GSNY. 10 You can answer. 11 A I don't know. 12 <b>Q Well, does Golden Spring know</b> 13 <b>whether Guo Wengui was working as its agent</b> 14 <b>when he was interacting with Strategic</b> 15 <b>Vision on the research agreement?</b> 16 MS. TESKE: Object to the 17 form. 18 You can answer. 19 A I believe he was working as an 20 agent of Golden Spring. 21 <b>Q Okay. Why do you believe that?</b> 22 A I think that's something that I've 23 learned but. 24 <b>Q What about when Golden Spring, I'm</b> 25 <b>sorry, when Strategic Vision started to do</b></p>	<p>1 A. COLUCCIO 2 Strategic Vision on the contract? 3 MS. TESKE: Object to the 4 form. 5 A I'm not sure. 6 <b>Q Does Golden Spring know the answer</b> 7 <b>to that question?</b> 8 A I don't know. 9 <b>Q Well, let me ask you this, was Guo</b> 10 <b>Wengui acting as the principal, the</b> 11 <b>controller of Golden Spring for purposes of</b> 12 <b>evaluating Strategic Vision's performance</b> 13 <b>under the agreement?</b> 14 MS. TESKE: Asked and 15 answered. 16 You can answer. 17 A I don't know. 18 <b>Q Does Golden Spring know the answer</b> 19 <b>to that question?</b> 20 A I don't know. 21 <b>Q Did Golden Spring report back to</b> 22 <b>Eastern Profit on the results of Strategic</b> 23 <b>Vision's research?</b> 24 A I believe in the beginning, yes. 25 <b>Q What do you mean by in the</b></p>
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1 A. COLUCCIO  
 2 **Q What do you know about Eastern's**  
 3 **termination of the agreement?**  
 4 MS. TESKE: The witness is not  
 5 here to testify about Eastern. The  
 6 witness is here to testify about  
 7 Golden Spring pursuant to the  
 8 Court's order.  
 9 MR. GREIM: Golden Spring was  
 10 also to testify to the topics that  
 11 were agreed to between Eastern  
 12 Profit and Strategic Vision?  
 13 MS. TESKE: That is, I  
 14 disagree with the interpretation of  
 15 the order, and that she was not  
 16 prepared in that capacity.  
 17 MR. GREIM: Well, that cuts  
 18 out a lot of the questions.  
 19 **Q What special expertise did Golden**  
 20 **Spring bring to the evaluation of Strategic**  
 21 **Vision's work under this contract?**  
 22 MS. TESKE: Object to the  
 23 form.  
 24 You can answer?  
 25 A I don't know.

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1 A. COLUCCIO  
 2 **Q Do you know what Golden Spring's**  
 3 **out-of-pocket cost have been in working on**  
 4 **the negotiation and the performance of the**  
 5 **contract and overseeing the litigation on**  
 6 **the contract?**  
 7 A No.  
 8 **Q Do you know if it has**  
 9 **out-of-pocket cost?**  
 10 A No.  
 11 **Q Do you know who's paying Golden**  
 12 **Spring, if anyone -- let me go back. I**  
 13 **think you've already answered that question.**  
 14 **Is it Golden Spring's**  
 15 **understanding that if the contract is**  
 16 **successful it will be paid for all its time**  
 17 **and out-of-pocket cost on this?**  
 18 MS. TESKE: Objection to the  
 19 form.  
 20 A It's my understanding that Golden  
 21 Spring is aware that they would be  
 22 compensated by Eastern Profit if the  
 23 agreement was successful.  
 24 **Q At this point though Golden Spring**  
 25 **New York knows it will never be compensated**

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1 A. COLUCCIO  
 2 on the contract; is that right?  
 3 MS. TESKE: Object to the  
 4 form.  
 5 You can answer.  
 6 A I don't know.  
 7 **Q Well, is Golden Spring, or I guess**  
 8 **I should ask you this, was Golden Spring**  
 9 **keeping track of the time and cost it**  
 10 **expended on its work on behalf of Eastern**  
 11 **Profit?**  
 12 A I don't know.  
 13 **Q Is that one of your jobs?**  
 14 A No.  
 15 **Q Do you keep your time, by the way?**  
 16 A No.  
 17 **Q Now, did Guo Wengui work on under**  
 18 **the direction of Yvette Wang?**  
 19 MS. TESKE: Object to the form  
 20 of the question.  
 21 A Not that I know of.  
 22 **Q Did he work under the direction of**  
 23 **Han Chunguang?**  
 24 MS. TESKE: Object to the  
 25 form. That's beyond the scope.

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1 A. COLUCCIO  
 2 **Q Do you know what Golden Spring's**  
 3 **out-of-pocket cost have been in working on**  
 4 **the negotiation and the performance of the**  
 5 **contract and overseeing the litigation on**  
 6 **the contract?**  
 7 A No.  
 8 **Q Do you know if it has**  
 9 **out-of-pocket cost?**  
 10 A No.  
 11 **Q Do you know who's paying Golden**  
 12 **Spring, if anyone -- let me go back. I**  
 13 **think you've already answered that question.**  
 14 **Is it Golden Spring's**  
 15 **understanding that if the contract is**  
 16 **successful it will be paid for all its time**  
 17 **and out-of-pocket cost on this?**  
 18 MS. TESKE: Objection to the  
 19 form.  
 20 A It's my understanding that Golden  
 21 Spring is aware that they would be  
 22 compensated by Eastern Profit if the  
 23 agreement was successful.  
 24 **Q At this point though Golden Spring**  
 25 **New York knows it will never be compensated**

1 A. COLUCCIO  
 2 Whether or not Guo Wengui  
 3 worked under the direction of  
 4 Eastern Profit or Han Chunguang is  
 5 not why GSNY is here to testify, nor  
 6 would it have that knowledge. It's  
 7 outside the scope of the Court's  
 8 order.  
 9 MR. GREIM: I think it  
 10 actually does have knowledge, but  
 11 you don't need to be suggesting  
 12 answers to the witness.  
 13 MS. TESKE: It is outside the  
 14 Court's order.  
 15 MR. GREIM: Because one of the  
 16 topics is Golden Spring's dealings  
 17 with Eastern Profit and Guo Wengui  
 18 that relate to negotiation,  
 19 execution or performance of the  
 20 contract --  
 21 MS. TESKE: Yes, and what you  
 22 --  
 23 MR. GREIM: And in those  
 24 dealings it may well have noticed  
 25 what Guo Wengui was doing, and

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38 (Pages 146 to 149)



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1 A. COLUCCIO  
 2 New York?  
 3 A I believe so.  
 4 **Q Did Golden Spring ultimately**  
 5 **recommend to Eastern Profit that it should**  
 6 **enter into the contract with Strategic**  
 7 **Vision?**  
 8 MS. TESKE: Object to the form  
 9 of the question.  
 10 You can answer.  
 11 A I'm not sure whether they  
 12 recommended, but I know that Yvette told  
 13 Mr. Han, you know, what she had found out  
 14 about Strategic Vision. She relayed  
 15 information from her discussions with Waller  
 16 and Wallop to Mr. Han.  
 17 **Q When was that?**  
 18 A Her conversation with Mr. Han? At  
 19 the end of the 2017.  
 20 **Q So this was after her first**  
 21 **discussion with Mr. Han, or was this --**  
 22 A I'm only talking about one  
 23 discussion with Mr. Han.  
 24 **Q I see.**  
 25 A At the end of 2017.

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1 A. COLUCCIO  
 2 entities?  
 3 MS. TESKE: Object to the  
 4 form.  
 5 A I don't know.  
 6 **Q Why did Golden Spring several**  
 7 **months into this litigation decide -- well,**  
 8 **let me ask you this.**  
 9 **Who drafted the limited power of**  
 10 **attorney that we looked at?**  
 11 MS. TESKE: Asked and  
 12 answered.  
 13 A I don't know.  
 14 **Q During the course of this case --**  
 15 **I guess we better go since you've been here.**  
 16 **What'd you say five months?**  
 17 A About seven months.  
 18 **Q Have you played any role in**  
 19 **gathering documents to be produced in this**  
 20 **case?**  
 21 A No.  
 22 **Q Did Golden Spring make any efforts**  
 23 **to help Eastern Profit find a way to pay for**  
 24 **the research agreement?**  
 25 A I don't know.

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1 A. COLUCCIO  
 2 **Q So in a discussion where she went**  
 3 **to Mr. Han and said, hey, I've got this**  
 4 **research project, that's also where she**  
 5 **conveyed the contents of her discussions**  
 6 **with Wallop and Waller?**  
 7 A I believe so, or yeah, whatever  
 8 discussions she had had up until that point.  
 9 **Q Didn't Chunguang Han meet Waller**  
 10 **and Wallop in Yvette Wang's presence?**  
 11 A I don't know.  
 12 MS. TESKE: Object to the  
 13 form.  
 14 **Q Has Golden Spring served as a**  
 15 **litigation power of attorney for any entity**  
 16 **before serving in that role for Eastern**  
 17 **Profit in this case?**  
 18 MS. TESKE: Object to the form  
 19 of the question. Asked and  
 20 answered.  
 21 You can answer.  
 22 A I don't know.  
 23 **Q Does Golden Spring have any**  
 24 **special skills or experience in serving as a**  
 25 **litigation power of attorney for other**

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1 A. COLUCCIO  
 2 **Q Did Golden Spring help Eastern**  
 3 **Profit negotiate a loan agreement with**  
 4 **Eastern Profit?**  
 5 A I don't know.  
 6 **Q I think I just said that the wrong**  
 7 **way, so your I don't know is clear.**  
 8 **Did Golden Spring New York help**  
 9 **Eastern Profit negotiate a loan agreement**  
 10 **with ACA?**  
 11 MS. TESKE: Object. Beyond  
 12 the scope.  
 13 But you can answer.  
 14 A I don't know.  
 15 **Q Did Golden Spring New York get**  
 16 **drafts of the loan agreement between Eastern**  
 17 **Profit and ACA?**  
 18 A I don't know.  
 19 **Q Does it have any drafts on its**  
 20 **email system?**  
 21 MS. TESKE: Object. Beyond  
 22 the scope.  
 23 A I don't know.  
 24 **Q Who does Golden Spring report to**  
 25 **at Eastern Profit regarding this litigation?**

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<p>1 A COLUCCIO  2 MS. TESKE: Beyond the scope.  3 But you can answer, if you  4 know.  5 A I don't know.  6 <b>Q Do you know who chose you to be</b>  <b>the 30B6 witness today?</b>  7 MS. TESKE: Objection to the  8 form.  9 A No.  10 <b>Q Has Eastern Profit assigned its</b>  11 <b>claim to Golden Spring New York.</b>  12 MS. TESKE: Objection to the  13 form.  14 If you know, you can answer.  15 It's beyond the scope, and  16 it's a legal question, but you can  17 answer?  18 A I don't know.  19 <b>Q Did Golden Spring, Eastern Profit,</b>  20 <b>Guo Wengui have any understanding as to the</b>  21 <b>role of each person or entity in the</b>  22 <b>negotiation of the contract at issue?</b>  23 MS. TESKE: Object to the form  24 of the question.</p>	<p>1 A COLUCCIO  2 to ensure that Guo Wengui would keep  3 information related to the contract  4 confidential?  5 A I don't know.  6 <b>Q Did it take any steps to ensure</b>  7 <b>that Eastern Profit would keep information</b>  8 <b>related to the contract confidential?</b>  9 A I don't know.  10 <b>Q Who was in charge of making that,</b>  11 <b>whatever research results were generated</b>  12 <b>were actually used for the purposes that Mr.</b>  13 <b>Wengui represented to Strategic Vision?</b>  14 MS. TESKE: Objection to the  15 form.  16 But you can answer.  17 A I don't know.  18 <b>Q Did Golden Spring ever express any</b>  19 <b>concern to Eastern Profit or Guo Wengui</b>  20 <b>about the truthfulness of Guo Wengui's</b>  21 <b>representations to Strategic Vision?</b>  22 A I don't know.  23 <b>Q Did Golden Spring ever express any</b>  24 <b>concern to either Eastern Profit or Guo</b>  25 <b>Wengui about the failure to disclose Eastern</b></p>
<p style="text-align: center;">Page 158</p>	<p style="text-align: center;">Page 160</p>

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1 A. COLUCCIO  
2 about this last night?  
3 A No.  
4 Q **I have to ask you, have you read**  
5 **the counterclaim in this case by Strategic**  
6 **Vision?**  
7 A I don't think I read the full  
8 pleading.  
9 Q **All right. Well, Golden Spring**  
10 **owed duties to Guo Wengui because, as you**  
11 **said, he was a client of Golden Spring; is**  
12 **that right?**  
13 MS. TESKE: That's a legal  
14 question. It's beyond scope.  
15 But you can answer?  
16 A Right he is a client of Golden  
17 Spring.  
18 Q **Did Golden Spring feel that it**  
19 **could independently investigate the claims**  
20 **Guo Wengui was making to Strategic Vision?**  
21 MS. TESKE: Object to the  
22 form.  
23 A I don't know.  
24 Q **Well, did Golden Spring know**  
25 **whether the representations Guo Wengui was**

1 A. COLUCCIO

2 Q **By the way, didn't Golden Spring**  
3 **owe a duty to Eastern Profit to make sure**  
4 **that Guo's representations were true?**

5 MS. TESKE: Object to the form  
6 of the question. That's a legal  
7 question not a factual question for  
8 the witness to answer.

9 But if you understand, you can  
10 answer, if you know.

11 A I don't know.

12 Q **Did Golden Spring think it owed a**  
13 **duty to its principal Eastern Profit to make**  
14 **sure that Guo's representations to Strategic**  
15 **Vision were true?**

16 MS. TESKE: Objection to the  
17 form.

18 You can answer.

19 A I would think so.

20 MR. GREIM: We'll go ahead and  
21 take a break.

22 VIDEOPHOTGRAPHER: The time is  
23 12:27 p.m. Tuesday November 11,  
24 2019. This is the end of media tape  
25 number two in the videotaped

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1 A. COLUCCIO  
 2 deposition of Ms. Amelia Coluccio.  
 3 We're off the record.  
 4 (Whereupon, a recess was taken  
 5 from 12:27 p.m. to 12:45 p.m.)  
 6 VIDEOGRAPHER: The time is  
 7 12:45 p.m. Tuesday November  
 8 12, 2019. This is media number  
 9 three of the videotape deposition of  
 10 Ms. Amelia Coluccio.  
 11 We are back on the record.  
 12 Q **Ms. Coluccio do you currently work**  
**for the Keefe Law Firm as well?**  
 13 A No.  
 14 Q **Was that the former firm that you**  
**had worked at before coming to Golden**  
**Spring?**  
 15 A Yes.  
 16 Q **And just to be clear, you have no**  
**other employers now; is that right?**  
 17 A Correct.  
 18 Q **Did Golden Spring -- we talked**  
**earlier about not just Golden Spring's**  
**negotiation with Strategic Vision, but also**  
**its advice to Eastern Profit regarding this**

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1 A. COLUCCIO  
 2 whole thing. I want to use our time wisely  
 3 here.  
 4 You didn't review it in  
 5 preparation for your testimony?  
 6 A No.  
 7 Q **Didn't review any documents, did**  
**you?**  
 8 A No.  
 9 Q **So is Golden Spring aware that**  
**Eastern Profit is doing business in the**  
**United States?**  
 10 A I don't know.  
 11 Q **Let's talk a little bit more.**  
**Well okay, here's another question. Is**  
**Golden Spring's limited power of attorney**  
**still in effect for Eastern Profit?**  
 12 MS. TESKE: Object.  
 13 These are all legal questions,  
 14 but you can go ahead and answer.  
 15 A I don't know.  
 16 Q **Has it been modified?**  
 17 A I don't know.  
 18 Q **Is there an amended power of**  
**attorney out there somewhere?**

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1 A. COLUCCIO  
 2 contract.  
 3 And so my question is, did Golden  
 4 Spring know that Eastern Profit was a Hong  
 5 Kong entity?  
 6 MS. TESKE: Object to the  
 7 form.  
 8 You can answer.  
 9 A Yes, I believe so.  
 10 Q **Did Golden Spring advise Eastern**  
**Profit that it ought to register to do**  
**business in the US before hiring Golden**  
**Spring to do this work for it here?**  
 11 A I don't know.  
 12 Q **Did it advise Eastern Profit that**  
**it should register in the US before hiring**  
**Strategic Vision to do work?**  
 13 A I don't know.  
 14 Q **Well, where was the work under the**  
**research agreement to be performed?**  
 15 A I don't know.  
 16 Q **Well now, have you ever seen the**  
**research agreement?**  
 17 A I don't think so.  
 18 Q **Well, we won't go through the**

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1 A. COLUCCIO  
 2 A Not that I know of.  
 3 Q **Does Golden Spring New York have**  
**an office in Hong Kong?**  
 4 A Golden Spring New York, no, that I  
 5 know of.  
 6 Q **Where is its parent company's**  
**office in Hong Kong?**  
 7 MS. TESKE: Object. Beyond  
 8 the scope.  
 9 If you know.  
 10 A I don't know.  
 11 Q **Is it at Bank of China tower?**  
 12 A I don't know.  
 13 MS. TESKE: Asked and  
 14 answered. Same objection.  
 15 Q **Do you know whether Eastern Profit**  
**and Golden Spring's parent company actually**  
**share an office in Hong Kong?**  
 16 A I don't know.  
 17 MS. TESKE: Same objection.  
 18 Q **Does Golden Spring New York have**  
**employees who work remotely?**  
 19 MS. TESKE: Asked and  
 20 answered.

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1 A. COLUCCIO  
2 You can answer.  
3 A Not that I know of.  
4 **Q Does Golden Spring New York -- I**  
5 **think we talked about its offices at 162**  
6 **East 64 Street right now?**  
7 A Right.  
8 **Q Most of your time that's where**  
9 **you've been working, right?**  
10 A Right.  
11 **Q Who pays its rent for that spot?**  
12 A I don't know.  
13 **Q Does Mr. Guo pay it?**  
14 A I don't know.  
15 **Q What about it's former spot, 800**  
16 **Fifth Avenue, you know the answer to that**  
17 **question?**  
18 A No.  
19 **Q What was GSNY's first office after**  
20 **it was formed?**  
21 A The first one I knew of was 800  
22 Fifth Avenue.  
23 **Q Do you know what a family office**  
24 **is; have you ever heard that term before?**  
25 A Yes.

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1 A. COLUCCIO  
2 Q **Is GSNY a family office for Guo?**  
3 MS. TESKE: Object to the  
4 form.  
5 You can answer.  
6 A Yes, but not only for Mr. Guo.  
7 Q **So have you ever heard of such a**  
8 **thing as a family office for more than one**  
9 **family?**  
10 MS. TESKE: Object to the  
11 form.  
12 A I don't know.  
13 Q **Okay. Is it your testimony that**  
14 **Golden Spring New York is a family office**  
15 **for families other than the Guo family?**  
16 A Well, I just mean that the Guo  
17 family isn't our only client.  
18 Q **A family office handles the**  
19 **investments for a family, right, it handles**  
20 **the business affairs for a family?**  
21 MS. TESKE: Object to the  
22 form.  
23 Q **Is that your understanding of what**  
24 **a family office is?**  
25 MS. TESKE: Same objection.

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A. COLUCCIO

A Somewhat. I guess not exactly.

**Q Tell me what your understanding of what a family office is.**

A I guess just a team of people who provide services to a family with whatever type of projects they need help with.

**Q So is Golden Spring New York the family office for other families besides Guo?**

A Not that I know of, but it's other clients are associates of the Guo family or business partners of the Guo family.

**Q Okay. Does that include, for example, the Saraca Media Group?**

MS. TESKE: Object to the form.

Direct the witness not to answer.

**Q Do you know the answer to that question?**

MS. TESKE: Object.

And direct the witness not to answer.

**Q I mean, look, one of the purposes**

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Does Golden Spring New York</b></p> <p>3 <b>control Saraca Media Group?</b></p> <p>4 MS. TESKE: Beyond the scope.</p> <p>5 If you know, you can answer.</p> <p>6 A I think Golden Spring New York is</p> <p>7 a parent company of Saraca, but I'm not</p> <p>8 positive.</p> <p>9 <b>Q Who's the president of Saraca?</b></p> <p>10 MS. TESKE: Object to the</p> <p>11 form.</p> <p>12 She's here to testify as GSNY</p> <p>13 not Saraca.</p> <p>14 A I don't know.</p> <p>15 <b>Q Is Saraca's equipment set up in</b></p> <p>16 <b>the GSNY office?</b></p> <p>17 MS. TESKE: Object. She's</p> <p>18 here to testify as to GSNY.</p> <p>19 If you know, you can answer.</p> <p>20 A I don't think Saraca has any</p> <p>21 equipment.</p> <p>22 <b>Q Let's talk about some other work</b></p> <p>23 <b>that Golden Spring New York does as a family</b></p> <p>24 <b>office as you testified.</b></p> <p>25 <b>Does it register trademarks for</b></p>	<p>1 A. COLUCCIO</p> <p>2 mouth of other people.</p> <p>3 <b>Q Whereabout has Golden Spring New</b></p> <p>4 <b>York trademark, everything as just</b></p> <p>5 <b>beginning?</b></p> <p>6 MS. TESKE: Object.</p> <p>7 And you don't need to answer.</p> <p>8 <b>Q Okay. Does Golden Spring New York</b></p> <p>9 <b>provide advice for ACA?</b></p> <p>10 MS. TESKE: Object.</p> <p>11 And don't answer.</p> <p>12 <b>Q Is one of the individuals that</b></p> <p>13 <b>Golden Spring works with in providing a</b></p> <p>14 <b>family office for Guo a man named William?</b></p> <p>15 MS. TESKE: Object.</p> <p>16 And don't answer.</p> <p>17 <b>Q Have you ever met William before?</b></p> <p>18 MS. TESKE: Object.</p> <p>19 And don't answer.</p> <p>20 <b>Q What role did William play in</b></p> <p>21 <b>assisting Eastern Profit to enter into the</b></p> <p>22 <b>research agreement?</b></p> <p>23 MS. TESKE: Object.</p> <p>24 Don't answer.</p> <p>25 That's beyond the scope.</p>
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1 A. COLUCCIO  
 2 you're here testifying today, golden Spring  
 3 New York Limited. And so what I'm showing  
 4 you here is what we were able to pull from  
 5 New York State.  
 6 Now, first of all, have you seen  
 7 this the document before?  
 8 A No. I don't believe so.  
 9 Q Who does the corporate filings for  
 10 Golden Spring New York?  
 11 A I'm not sure.  
 12 Q All right. Let's go to the second  
 13 page of the very first document, which was  
 14 an application for authority for Golden  
 15 Spring to operate as a foreign corporation  
 16 in New York. And so you'll see it's signed  
 17 at the bottom.  
 18 What name do you see down there?  
 19 A Qiang, Guo.  
 20 Q And what's in parentheses after  
 21 his name?  
 22 A Mile's son.  
 23 Q And his title?  
 24 A Executive vice president.  
 25 Q Now, is Mile's son the English

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1 A. COLUCCIO  
 2 something. So the last document was filed March 10,  
 3 2015. Now we're in March of 2017.  
 4 Who is listed as the CEO of Golden  
 5 Spring?  
 6 A Yanping Wang.  
 7 Q That's the same thing as Yvette,  
 8 correct?  
 9 A Right.  
 10 Q Then you see an address of 800  
 11 Fifth Avenue, Suite 21F?  
 12 A Right.  
 13 Q Is that the same address you  
 14 testified earlier as the office where you  
 15 started to work at Golden Spring?  
 16 A Right.  
 17 Q And let's see what else here. At  
 18 the bottom you see there's an electronic  
 19 signature by a lawyer Courtney Scanlon?  
 20 MS. TESKE: Object to the  
 21 form.  
 22 Q Do you see that?  
 23 A Yes.  
 24 Q Do you know who that is?  
 25 A No.

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1 A. COLUCCIO  
 2 nickname for Guo Qiang?  
 3 MS. TESKE: Objection. Beyond  
 4 the scope.  
 5 A I think that's his name in  
 6 English. That's what he goes by.  
 7 Q Right. That's not a translation,  
 8 but that's what he goes by in English?  
 9 A I think so.  
 10 Q And this is the son of Guo Wengui,  
 11 correct?  
 12 A I believe so.  
 13 MS. TESKE: Objection to form.  
 14 Q Who is the current executive vice  
 15 president of Golden Spring New York; do you  
 16 know?  
 17 A I don't know.  
 18 Q Do you know if Qiang Guo ever  
 19 stopped being executive vice president of  
 20 New York or of Golden Spring New York?  
 21 A I don't know.  
 22 Q Let's flip forward to the middle  
 23 here.  
 24 So you'll see the first biennial  
 25 statement; and every two years you have to file

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1 A. COLUCCIO  
 2 Q You ever met her?  
 3 A No.  
 4 Q Let's go to the last one, second  
 5 to, the very last page is now the 2019  
 6 statement. And do you see once again Yvette  
 7 as listed, Yvette Wang as listed as CEO?  
 8 A Yes.  
 9 Q Using her name Yangping?  
 10 A Um-hmm.  
 11 Q What other businesses shared 800  
 12 Fifth Avenue, Suite 21F with Golden Spring  
 13 New York?  
 14 MS. TESKE: Objection to form.  
 15 Beyond the scope.  
 16 A None that I know of.  
 17 Q Have you met Mile's son by the  
 18 way?  
 19 MS. TESKE: Asked and  
 20 answered.  
 21 Q I'm sorry. Maybe you did, but I  
 22 forget now.  
 23 A I've met him.  
 24 Q And has he ever given you  
 25 direction on your work for Golden Spring?

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1 A. COLUCCIO  
 2 A No.  
 3 **Q Who typically does give direction**  
 4 **to Golden Spring on behalf of the Guo**  
 5 **family?**  
 6 MS. TESKE: Object to the  
 7 form. It's beyond the scope as it  
 8 pertains to other clients. It's  
 9 outside of the balance of the  
 10 Court's order, so if you're talk  
 11 about with respect to this case,  
 12 then she can answer.  
 13 MR. GREIM: Okay. Let's keep  
 14 it with respect to this case.  
 15 **Q Who on behalf of the Guo Family**  
 16 **gives direction to Golden Spring New York?**  
 17 MS. TESKE: Object to the  
 18 form?  
 19 A I believe Mr. Guo.  
 20 MR. GREIM: Well, we're going  
 21 to hold this deposition open. We  
 22 have some disputes about the topics  
 23 in the scope. I think we've had a  
 24 lot of talk on the record about it,  
 25 but we're not going to use up the

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1 A. COLUCCIO  
 2 ordering a copy of the transcript?  
 3 MS. TESKE: No one will be  
 4 provided to us as a nonparty.  
 5 MR. GREIM: I will order a  
 6 copy.  
 7 VIDEOGRAPHER: The time is  
 8 1:09 p.m. Tuesday, November 12,  
 9 2019. This is the end of media  
 10 number Three and complete today's  
 11 videotape deposition of Ms. Amelia  
 12 Coluccio.  
 13 (Continued on the next page to accommodate the  
 14 jurat).

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1 A. COLUCCIO  
 2 fingers and forearms of the court  
 3 reporter or the tape any longer on  
 4 that. So we're just going to hold  
 5 it open and then we'll have our  
 6 discussion after we're done, but I  
 7 want to thank you for your time  
 8 today.  
 9 x: Object to the holding of  
 10 the deposition open. We made the  
 11 witness available all day today. If  
 12 we're ending now then that is the  
 13 end of the deposition. That's our  
 14 position.  
 15 MR. GREIM: And just to be  
 16 clear, the basis of our objection or  
 17 of our holding this deposition open  
 18 is the witness's lack of preparation  
 19 and lack of knowledge about pretty  
 20 much everything about the case. And  
 21 so we will explore that in more  
 22 detail off the record, but thank you  
 23 very much for being with us today.  
 24 It was nice to meet you.  
 25 COURT REPORTER: Are you

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1 A. COLUCCIO  
 2 We are off the record.  
 3 MR. GREIM: I will order from  
 4 you and then I'll give it to her as  
 5 we've been doing.  
 6 (Whereupon, this examination was  
 7 concluded at 1:10 p.m.)

AMELIA COLUCCIO

14 Subscribed and sworn to  
 15 before me on this \_\_\_\_ day  
 16 of \_\_\_\_\_, \_\_\_\_\_.  
 17

Notary Public

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30(b)(6): Amelia Coluccio  
 November 12, 2019

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